



ST HELENS
BOROUGH COUNCIL

ST HELENS BOROUGH LOCAL PLAN 2020-2035

**COPIES OF REGULATION 20
REPRESENTATIONS (REGULATION 22 (1) (D))
DOCUMENT**

REPRESENTATION ORDER

RO0401 – RO0500

SEPTEMBER 2020

RO0401



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

15 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

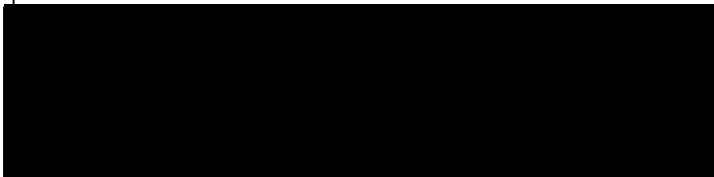
This form has two parts;

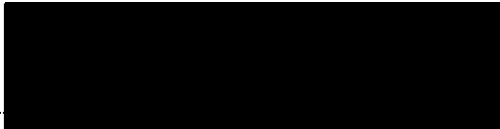
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>PAUL</u>	First name: _____
Last Name: <u>CUMMINGS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>346 Garswood Road</u>	Address: _____
<u>Garswood</u>	_____
<u>M. Wigan</u>	_____
Postcode: <u>WN4 0TY</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>11 March 2019</u>
--	----------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LP A05 Site IHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

I object to the proposed plan. It is not justified. There will be no additional school places C.P. places, health care resources. There will be considerable increase in traffic to the detriment of the remaining green belt. No additional local shops thereby increasing traffic on small roads to reach shops in Garwood. What effect does the national gas pipeline have on restricting development here?

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This housing development on green belt land is simply not meeting a housing shortage locally. It will destroy the adjoining enjoyment of green belt land adjoining the development. Think again please. Traffic in rush hour is already way beyond road capacity - eg. traffic has to queue to leave Carswood at the Ashton Cross.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0402

ELO255



Fwd: St Helens Borough Local Plan 2020-2035: Submission Draft

Anne-Marie Cunliffe

to:

planningpolicy

13/03/2019 16:50

Hide Details

From: Anne-Marie Cunliffe

To: planningpolicy@sthelens.gov.uk

① - LPA04

② - LPA05

----- Forwarded message -----

From: "Anne-Marie Cunliffe"

Date: 13 Mar 2019 16:46

Subject: St Helens Borough Local Plan 2020-2035: Submission Draft

To: <planningpolicy@st.helens.gov.uk>

Cc:

Further to earlier comments on the warehousing being erected at Florida Farm North, having seen at first hand how enormous these units are in reality and how close to existing residences I am duty bound to express my dismay at the prospect of further development. Local residents are dealing daily with travel delay, noise and light pollution and the warehousing is not yet finished nor has the attendant heavy goods traffic begun to operate. There appears to be no concerted attempt to negate any of the considerable impact on the environment or welfare of those of us whose lives are being blighted by this development. Therefore, the prospect of further units in the area existing without proper infrastructure in place is horrifying to contemplate. We have a suggestion of 522 houses being sited at Vicarage Road in an area already congested with traffic, close to a flooding area, with inadequate health centres and school provision. How can any of this improve things? We should use the thousands of empty properties before building residences on greenbelt land. Are homeowners, who have paid a premium to reside in a greenbelt area, going to be financially compensated for the consequent reduction in house values and moved into a lower council tax band? May I respectfully remind councillors that they are elected to represent the wishes of the people and not their own agenda!

AM Cunliffe

Lifelong Resident of the (badly) affected area



St. Helens
Council

278

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title: _____
First Name: <u>ANNE-MARIE</u>	First name: _____
Last Name: <u>CUNLIFE</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>339 LIVERPOOL ROAD</u> <u>HAYDOCK</u>	Address: _____
Postcode: <u>WALL 0UN</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	email: _____

Signature: _____	Date: <u>25/2/19</u>
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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Victoria Square
St Helens
WA10 1HP**

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FURTHER INFORMATION

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Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LP05 SITE 2HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant? <i>Don't know</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support the legal compliance or soundness of the Local Plan</u>, please also use this box to set out your comments.</p> <p>My objections include the use of green belt land which is supposed to restrict development to ensure efficient use of land & prevent settlements merging. The consideration of land near Liverpool Road cul-de-sac appears to disregard this particularly for the following reasons.</p> <ol style="list-style-type: none"> 1) access/egress to/from proposed site is inadequate and potentially hazardous; additional traffic not put undue stress on road network 2) well-documented flooding problems likely to increase and put intolerable pressure on Clisby Brook 3) lack of infrastructure (schools, medical centres etc) would encourage more use of private transport, not less 4) St Helens population has been in decline for decades - there is the justification for more housing, particularly as there are many unoccupied properties in other areas of St Helens? 5) no statement of common ground with neighbouring authorities is in evidence in the documentation I've seen

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I suggest that the following statement be included as a significant modification: -
'delete the land from the proposed removal from the green belt'

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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RO0403



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Part B - Your Representation(s)

25 FEB 2019

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title: _____
First Name: <u>Paula</u>	First name: _____
Last Name: <u>Cuniffe</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>6 Spring Drive,</u> <u>Gaswood,</u> <u>Ashton-in-Makerfield</u>	Address: _____
Postcode: <u>WN4 0UG</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>19/02/19</u>
------------------	-----------------------

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☒ Yes (via email)

☐ No

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St.Helens Council
Town Hall
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St Helens
WA10 1HP**

or by hand delivery to:

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**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
LPA06 - Site 1HS									
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support the legal compliance or soundness of the Local Plan</u>, please also use this box to <u>set out your comments</u>.</p> <p>Housing in this area isn't sustainable because of the lack of school places, doctor's surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities.</p> <p>There is no common ground with neighbouring authorities.</p> <p>The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal
from the greenbelt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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--

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St. Helens
Council

(17)

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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PART A - YOUR DETAILS

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>PAULA</u>	First name: _____
Last Name: <u>CUNLIFFE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>6 STIRLING DRIVE</u> <u>GLASWOOD, ASHTON-IN-</u> <u>MAKERFIELD</u>	Address: _____
Postcode: <u>W14 0UG</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: <u>[REDACTED]</u>	Mobile No: _____
Email: <u>[REDACTED]</u>	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>20-02-2019</u>
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WA10 1HP**

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for each separate comment/representation.**

PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?

Policy LPA05 - Site 11A		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

- NOT JUSTIFIED - THE COUNCIL SHOULD BE ~~BASE~~^{PUT} TO STRICT PROOF ITS POPULATION ESTIMATES. THE POPULATION OF ST HELENS HAS BEEN IN DECLINE SINCE 1981 - WHERE ARE THE EXTRA PEOPLE COMING FROM?
- USING GREENBELT FAILS TO ENCOURAGE ONE OF THE MAIN PURPOSES OF GREENBELT WHICH IS TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE REUSING OF DERELICT & OTHER URBAN LAND
- RELEASING GREENBELT CAUSES SIGNIFICANT HARM TO GREENBELT PURPOSES
- INCREASED HOUSING IN THIS AREA ISNT SUSTAINABLE DUE TO LACK OF SCHOOL PLACES, HEALTHCARE FACILITIES & BUS ROUTES. USE OF CARS IS BEING ENCOURAGED BECAUSE OF LACK OF FACILITIES
- ACCESS TO THE SITE WOULD BE IN ADEQUATE

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

REMOVE THIS LAND FROM THE PROPOSED REMOVAL
FROM THE GREENBELT

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0404



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

- 1 MAR 2018

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

01 MAR 2019

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name: <i>MARGARET</i>	First name:
Last Name: <i>CUNLIFFE</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>452 GARSWOOD RD</i>	Address:
Postcode: <i>WN4 0XJ</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature:

[Redacted Signature]

Date:

28-2-2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy 2PA05	LPSD 1HA	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, Doctor's surgeries, bus routes, parking at the train

Station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road and Garswood Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

20A93

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

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Please keep a copy for future reference.

RO0405



St Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

- 1 MAR 2018

(For official use only)

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

01 MAR 2019

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>DEREK</u>	First name:
Last Name: <u>CUNLIFFE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>452 GARSWOOD RD</u>	Address:
Postcode: <u>WN4 0XJ</u>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: 	Date: <u>28-2-2019</u>
--	------------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

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Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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Telephone: 01744 676190

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy LRA06	Paragraph / diagram / table PSD IHS		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, Doctor's surgeries, bus routes, parking at the train

Station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

JOHNS

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination
--	---

	Yes, I wish to participate at the oral examination
--	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

RO0406

170

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

0-1 MAR 2019
For official use only

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www.sthelens.gov.uk/localplan

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: GRAHAM

Last Name: CUNLIFFE

Organisation/company: _____

Address: 2 AVERY CRES
HAYDOCK

Postcode: W11 0XD

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 25/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address. ✓

1 view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

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post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy LPA 04 SITAS 2EA 5EA 6EA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	DONT KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

NOT Justified - the Council should be put to strict proof of the need for this type of development in this position on this scale

The risk of flooding further down the Clapsley Brook will be exacerbated by future development at this location

Heavy volumes of traffic will add to the already over capacity on highways in the vicinity

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

"Delete this land from the proposed removal from the Greenbelt."

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

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St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>GRAHAM</u>	First name:
Last Name: <u>CUNLIFFE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>2 AVARY CRAS</u> <u>HAYDOCK</u>	Address:
Postcode: <u>WA11 0XD</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: <u>25/2/19</u>
-----------------------	----------------------

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☐ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

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**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LPA -05 SITE 2HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Don't know
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>1/ Increase in traffic will cause congestion, noise and air pollution which is not good for health and would put added pressure on the health service.</p> <p>2/ One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt to encourage this.</p> <p>3/ The access to the site is inadequate, a left turn left out from the East Lancs Road isn't safe, and the proposal for a junction at Liverpool Road over a stretched highway system. There would be problems of traffic running through the proposed development.</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

"Delete this land from the proposed removal from the Greenbelt"

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0407

230

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>MARINA</u>	First name:
Last Name: <u>CUNLIFFE</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>2 AVERY CRESC</u> <u>HAYDOCK</u>	Address:
Postcode: <u>WA11 0XD</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	

Signature: [REDACTED]	Date: <u>25/2/19</u>
-----------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

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planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LPA - OS STE ZHA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No DONT KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

NOT JUSTIFIED THE COUNCIL SHOULD BE PUT STRICT PROOF OF ITS POPULATION ESTIMATES. THE POPULATION OF ST HELENS HAS BEEN IN DECLINE SINCE 1981 WHERE ARE THE EXTRA PEOPLE COMING FROM?

2/ ONE of the purposes of greenbelt is to assist urban regeneration by encouraging the recycling of derelict land and other urban land.

3/ Housing in this area isn't sustainable because of lack of school places, doctors surgeries bus routes and other services. The use of cars is being encouraged because of the lack of facilities.

4/ Increase in traffic ~~will~~ will cause congestion, noise and air pollution which is not good for health and will put added pressure on the health service.

5/ No need for more housing.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

"Delete this land from the proposed removal from the Greenbelt."

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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132

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

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Title: <u>MRS</u>	Title: _____
First Name: <u>MARINA</u>	First name: _____
Last Name: <u>CUNLIFFE</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>2 AVERY CRES</u> <u>HAYDOCK</u>	Address: _____
Postcode: <u>WA11 0XD</u>	Postcode: _____
Tel No: _____	_____
Mobile: _____	_____
Email: _____	_____

Signature: _____	Date: <u>25/2/19</u>
------------------	----------------------

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LPA 04 SITES 2EA 5EA 6EA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No DONT KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>1/ The release of Greenbelt will cause significant harm to the purpose of greenbelt.</p> <p>2/ High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity.</p> <p>3/ The council has already granted planning permission in the greenbelt in respect of site 2EA Florida Farm North.</p>
--

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

"Delete this land from the proposed removal from the Greenbelt."

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Please keep a copy for future reference.

RO0408

①-LPA05

②-LPA06

PF0583

Ref: LPSD

(For official use only)



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: ALISON

Last Name: CUNNINGHAM

Organisation/company: _____

Address: 8 KELVIN CLOSE

GARSWOOD

NE WIGAN

Postcode: WN4 0UQ

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 11.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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or by hand delivery to:

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for each separate comment/representation.**

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3. To which part of the Local Plan does this representation relate?									
Policy	LPA05 Site IHA.	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>See separate sheet attached.</p>
--

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Delete this land from the proposed
removed from the Green Belt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓

No, I do not wish to participate
at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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PART B – YOUR REPRESENTATION

LPA05 – SITE 1HA

1. Greenbelt land should only be released in exceptional circumstances.
There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HA
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. Drainage in the area is very poor – site 1HA regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy LPA06 Site IHS	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

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See separate sheet attached

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Delete this land from the proposed removal from the Green Belt

Please continue on a separate sheet if necessary

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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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There are no exceptional circumstances in St Helens, which is a borough with a falling population.
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
 - a. Water mains run through site 1HS
 - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
 - c. There is a bell pit under site 1HS
 - d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

(2)

RO0409

① - LPA06 ② - Statement of Common Ground

Representor Details

Web Reference Number	WF0274
Type of Submission	Web submission
Full Name	Mr John Cunningham
Organisation	
Address	19 Sherwood Close Rainhill Prescot Merseyside L35 4RA
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The road network surrounding 3HS is already at capacity now and would be made unsustainable by the proposed housing development. There is only one A road serving the Rainhill area (Warrington Road), together with a B road (Rainhill Road) and a C road (Two Butt Lane). These roads at times are currently unable to support present traffic demands, particularly during rush hours, and developing further houses in the vicinity will only add to the problem for all residents who own vehicles and make it more dangerous for pedestrians and cyclists. Because of existing traffic jams around the junction of Rainhill Road and Warrington Road (skew bridge), traffic already uses residential estates around Longton Lane as a cut through and this will only be exacerbated. The junction at skew bridge would require significant widening and improvement to support this housing development. Furthermore, housing development would be unsustainable in this locality due to a lack of infrastructure and services such as doctors surgeries, dental practices, schools, hospitals and A&E facilities. These services are already under strain without the proposed housing development. In addition, the water table of 3HS is already a confirmed zone 2 and 3 flood zone and further housing development on this land would put houses bordering the brook [REDACTED] at increased risk of flooding. Furthermore, the land at and around 3HS supports a variety of wildlife and plants, including 13 protected species. Development at this site would be detrimental to these species, as

①

well as having a negative effect on people's wellbeing by removing some of the only green belt land in this locality. Housing development would lead to increased risk of air pollution and would result in increased risk of premature death from respiratory diseases, which are already higher in St Helens compared to regional and national averages (e.g. between 2013 and 2015 there was an average of 51.9 deaths per thousand in St Helens, compared to 33.1 deaths per thousand in England as a whole). Finally, there has been no statement of common ground with neighbouring authorities such as Knowsley Borough Council, where new housing developments are already under way, negating the need for further housing development on 3HS.

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7. Please set out modification(s) you consider are necessary

The Council should not consider removing 3HS from classification as green belt land, therefore abiding with the National Planning Policy Framework (2019).

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/10/2019 9:52:26 AM
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RO0410

①-LPA04 ②-LPA05 ③-GEN
④-IDP ⑤-Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0283
Type of Submission	Web submission
Full Name	Mr Zach Cunningham
Organisation	
Address	2 Lynton Way Windle St Helens WA10 6DZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

7. Please set out modification(s) you consider are necessary

I do not believe this version satisfies:

the requirement for Sustainable development

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

In addition, the following fundamental elements of the Plan remain questionable

Economic growth predictions for St Helens are based on flawed historical

③

①

- data that does not justify the aspirational targets included in the plan. ①
- Adequate regional and cross border collaboration has not been undertaken. ⑤
 - The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
 - The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
 - The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
 - The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. ②
 - The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
 - The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. ③
 - The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) ④
 - The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. ③
 - The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to ④

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 6:18:12 PM
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RO0411

①-LPA04 ②-LPA05 ③-GEN
④-IDP ⑤-Para 17.2 OTC

Representor Details

Web Reference Number	WF0284
Type of Submission	Web submission
Full Name	Mr Evan Cunningham
Organisation	
Address	2 Lynton Way Windle St Helens WA10 6DZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	Policy LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

7. Please set out modification(s) you consider are necessary

I do not believe this version satisfies:

the requirement for Sustainable development

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

In addition, the following fundamental elements of the Plan remain questionable

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

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①

- Adequate regional and cross border collaboration has not been undertaken. (5)
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. (2)
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. (2)
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. (3)
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) (4)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. (3)
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. (4)

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 6:13:25 PM
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RO0412

①-LPA04 ②-LPA05 ③-GEN
④-IDP ⑤-Para 17.2 OTC

Representor Details

Web Reference Number	WF0286
Type of Submission	Web submission
Full Name	Ms Clare Cunningham
Organisation	
Address	2 Lynton Way Windle St Helens WA10 6DZ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Policy LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

7. Please set out modification(s) you consider are necessary

I do not believe this version satisfies:

the requirement for Sustainable development

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

In addition, the following fundamental elements of the Plan remain questionable

Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

③

①

- Adequate regional and cross border collaboration has not been undertaken. ⑤
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. ②
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. ③
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) ④
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. ③
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. ④

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/9/2019 6:03:36 PM
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RO0413

Representor Details

Web Reference Number	WF0111
Type of Submission	Web submission
Full Name	Mr Philip Curran
Organisation	
Address	Ivy House Higher Lane Rainford St Helens WA118NU
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	HA8 Rookery Lane
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

There are no exceptional circumstances that justify not using the standard method to calculate housing need for this development. The economic analysis is flawed and based on over-optimistic assumptions. There is no need to change green belt boundaries to try to justify the need for this development. The site is located next to an industrial development with industrial activity ongoing. Other sites have been excluded when industrial activity is so close to homes from a risk perspective. This land is grade 1 Agricultural Land that is actively farmed to produce food for our communities and provide employment to people in the community, taking this away is needless and counter productive.

7. Please set out modification(s) you consider are necessary

Do not build on Green Belt there are sufficient opportunities to build on brownfield sites throughout the borough.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 9:01:00 AM
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RO0414



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: KAREN	First name:
Last Name: CURRY	Last Name:
Organisation/company:	Organisation/company:
Address: 14 CROCUS GARDENS NEW BOLD	Address:
Postcode: WA9 4EE	Postcode:
Tel No:	Tel No:
Mobile: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 16.4.19
-----------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO0415



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.


This form has two parts;

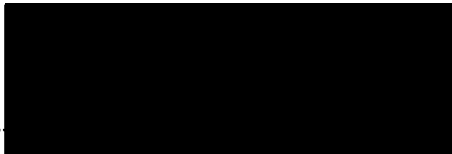
Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>JOHN</u>	First name: _____
Last Name: <u>CUSHION</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>90, ELGIN AVENUE</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0RH</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: 	Date: <u>11/3/19</u>
--	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: **www.sthelens.gov.uk/localplan**

If you still need assistance, you can contact us via:

Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **www.sthelens.gov.uk/localplan**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram/ table <i>H</i>	<i>HA2</i> <i>HS02</i> <i>GARSWOOD</i>	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p><i>I am against this proposed development as it will lead to a lot more traffic in the area as well as lack of infrastructure. I.E. not enough School places for extra children and lack of facilities at Doctors surgery in Garswood. It is bad enough now trying to get to see a doctor</i></p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate
at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0416



St. Helens Borough Local Plan 2020-2035/Local Plan Submission Draft (HA8)
 Emma Cutler
 to:
 planningpolicy
 13/03/2019 16:44

610248

Site 843

① - LPA05

② - para 1.7.2

③ - SA

I write to give my comments in the above plan with regards to building new houses in Rainford Village.

The main points are as follows:-

- * There are no exceptional circumstances to justify not using the standard method to calculate housing need.
- * The economic analysis is based on over-optimistic assumptions and is therefore flawed.
- * The level of land needed is not as high as set out in the Local Plan.
- * No exceptional circumstances to change Greenbelt boundaries.
- * Other reasonable alternatives have not been fully explored, eg using more previously developed land. These will have less impact on the environment and lead to less need for new infrastructure.
- * The Council have failed to co-operate with other Councils and have not published any statement(s) of common ground.

Rainford Specic Points for HA8 (8HA) Rookery Lane:-

- * Only 4 sites score 4 negatives (red) on the Sustainability Appraisal and the other 3 have all been discarded. So St. Helens Borough Council's own assessment is that HA8 (8HA) is the least appropriate Greenbelt site for housing in Phase 1.
- * This site is right next to an industrial estate and subject to risks associated with industrial activity, such as pollution and explosives (both of which have been recorded recently). Other sites have been excluded during assessments due to be next to similar industrial employment land, eg SHLAA 3016 site assessment ref 16m & 142.
- * The site is Grade 1 Agricultural Land and is actively farmed. This provides employment in the agricultural sector which are threatened by the removal of this site for the Greenbelt.

Me and my family accept the need for housing development in Rainford and are in principal are not opposed to it. However, we are deeply concerned firstly regarding the amount of new homes that are proposed to be built and also building on Greenbelt land rather than utilising previously developed/Brownfield sites.

We hope St. Helens Council reconsiders this Plan for all the reasons stated above.

Emma Cutler
 4 Croxteth Drive
 Rainford
 St. Helens
 WA11 8JZ

RO0417



St. Helens
Council

(321)

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

07 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: TIMOTHY

Last Name: CUTLER

Organisation/company: /

Address: 47 SPRINGFIELD PARK

HAYDOCK, ST HELENS

MERSEYSIDE

Postcode: WA11 0XP

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 6/3/19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy <i>LPA 05 Site 2 HA</i>	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<i>Don't know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

- 1) St Helens' population has been in decline since 1981. How can this correlate to the need for yet more houses, especially in greenbelt land
- 2) One of the main purposes of Greenbelt is to encourage / prioritise the use of non-Greenbelt land. This proposal is totally contrary to this vital objective
- 3) Site access is totally inadequate for the estimated 2000+ vehicle movements per day. The East Lancs & surrounding smaller roads are already swamped with traffic in rush hours. FFS & FFS (8000+ vehicle movements per day) will be completely chaotic
- 4) There is already flooding on FFS. Building as proposed will exacerbate this
- 5) Local services, schools, doctors, etc are already overstretched !!

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0418



St. Helens
Council

328

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

07 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:
www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: JACQUELINE

Last Name: CUTLER

Organisation/company: /

Address: 47 SPRINGFIELD PARK

HAYDOCK, ST. HELENS

MERSEYSIDE

Postcode: WA11 0XP

Tel No: [REDACTED]

Mobile No: [REDACTED]

Email: [REDACTED]

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: [REDACTED]

Date: 6/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy LPA 05 SITE 2 HA	Paragraph/ diagram table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)				

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Don't know
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

- 1) I believe a major reason for Green Belt land is to promote rather the use of non-greenbelt land, of which there is much brownfield site available in St. Helens. Therefore the proposed by St. Helens Council is totally contradictory of this.
- 2) There is already flooding on Florida Farm South which has increased since the FEN developments. Further build up will exacerbate this and have knock on effects to adjacent areas which are already susceptible eg:- Black Brook.
- 3) As the St. Helens population has been declining since 1981, I cannot see the need for yet more housing ESPECIALLY ON GREENBELT land.
- 4) The access to the proposed site is a major concern. I believe there to be an estimated increase of 2000+ vehicles per day. The A580 is already at break up point at rush hour & unbelievably busy even off peak. A further access into the A580 will surely result in complete chaos.
- 5) Infrastructure in Haydock is already stretched to the limit & yet no plans for increase in school places, doctors surgeries etc appear to have been planned for.

Please continue on a separate sheet if necessary.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

"Delete this land from the proposed removal from the Greenbelt."

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0419

Representor Details

Web Reference Number	WF0444
Type of Submission	Web submission
Full Name	Ms Charmian Cvek
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is not justified because the prediction for new housing need is flawed and would seem to be based on old predictions. The town of St Helens is in poor shape economically. There is no mention of Brownfield or Previously Developed Land. It seems only the easiest option (for the developers) has been considered. It is not effective because building on areas around the town centre would surely help in terms of regenerating the town itself, rather than opting for annexing the green belt. The use of green belt will create pseudo suburban enclaves with little or no affinity with the town of St Helens and no incentive to shop or socialise there. I am one of the few of my friends who actually ever goes into St Helens town centre. Most people prefer to visit Wigan or Warrington - by car of course - so the plan is not consistent with national policy (ie NPPF 2018). It will result in increased strain on already over-used roads. The recent works at Windle Island have created rat runs with HGVs using the country lanes. The air quality has deteriorated considerably in recent years. I can smell the pollution from the road when I am in my garden and avoid even going for a walk along Burrows Lane at the busiest times because it is so bad. The litter along the country lanes is deplorable. There is no alternative to car use, public transport in the Eccleston area is dire with no link to Prescott any more and the bus from St Helens Junction terminating in town at a very early

hour. There is no viable alternative to driving in this area. More traffic will put an intolerable strain on the roads - especially as there is so much development towards Haydock. This number of houses will also put a strain on local services - schools and medical practices.

7. Please set out modification(s) you consider are necessary

Greenbelt which is so vitally needed should be safeguarded against development. I was appalled by the use of the word safeguarding in the context of this plan, i.e. meaning safeguarding for future development and that is what prompted me to voice my concerns about the local plan. Brownfield and PDL should be considered, including bringing sites presently considered unsuitable back into use, instead of targeting prime agricultural land.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/24/2019 6:12:26 PM
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RO0420



St Helens
Council

398

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

11 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable) ALSO ON BEHALF OF
Title: <u>MRS</u>	Title: <u>MRS</u>
First Name: <u>ALISON</u>	First name: <u>JOAN</u>
Last Name: <u>RIDD</u>	Last Name: <u>DAGNALL</u>
Organisation/company:	Organisation/company:
Address: <u>100, BEECH GARDENS</u> <u>RAINFORD</u> <u>ST. HELENS</u>	Address: <u>14, OLD LANE,</u> <u>RAINFORD</u> <u>ST. HELENS</u>
Postcode: <u>WA11 8EB</u>	Postcode: <u>WA11 8JE</u>

Signature: <div style="background-color: black; width: 400px; height: 40px; display: inline-block;"></div>	Date: <u>8/3/19</u>
--	---------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA02 LPA05	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
		4.6.8 - 4.6.15 Table 4.5 8HA							
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>It is our understanding that Green Belt land should only be released for development under exceptional circumstances. With a falling population, these cannot be considered exceptional circumstances. The proposed site 8HA is prime agricultural land and in the current situation of climate change and political uncertainty it would be irresponsible to future generations to give up this land.</p> <p>Building on this land would significantly affect the character and heritage of this area.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove areas which are currently in the Green Belt from the plan. Find alternative sites from brown-field land.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0421

494 12 MAR 2019

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title: _____
First Name: <u>KALI DAGNALL</u>	First name: _____
Last Name: <u>DAGNALL</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>12 WATERLAND LANE</u>	Address: _____
<u>PARR</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA9 3AF</u>	Postcode: _____
Tel No: <u>2</u>	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____

Date: 5/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: **www.sthelens.gov.uk/localplan**

If you still need assistance, you can contact us via:

Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **www.sthelens.gov.uk/localplan**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
IHA LPA	S	Smock LANE							
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Urban Sprawl .</p> <p>Housing numbers unjustified</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete land from proposed
remove from greenbelt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy 1 HS		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
LPA06 Billinge B									
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.

Urban sprawl

Housing numbers increase

1) Delete paper 1C from resource.
from greenbelt

RO0422

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSP
30 APR 2019
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**
Any comments received after this deadline **cannot** be accepted.

This form has two parts;


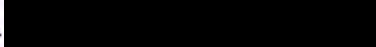
Part A - Personal Details

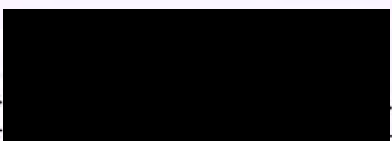
Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

807

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>JANET</u>	First name: _____
Last Name: <u>DALTON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>9 FIRTHLAND WAY, PARR</u> <u>ST. HELENS</u>	Address: _____
Postcode: <u>WA9-3RQ</u>	Postcode: _____
Tel No: 	Tel No: _____
Mobile No: 	Mobile No: _____
Email: _____	Email: _____

Signature: 	Date: <u>18-4-2019</u>
--	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

RO0423

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD
30 APR 2019
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:
www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>LIZ</u>	First name: _____
Last Name: <u>DALTON</u>	Last Name: _____
Organisation/company: <u>A</u>	Organisation/company: _____
Address: <u>9 FIRTHLAND WAY</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA9 3RG</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>18/4/2019</u>
------------------	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

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RO0424

①-LPA05 ②-LPA06, 3HS ③-LPA06, 8HS

④-LPA04 ⑤-10P

Representor Details

Web Reference Number	WF0073
Type of Submission	Web submission
Full Name	mrs Maureen Daly
Organisation	
Address	48 Springfield Lane Eccleston St, Helens wa10 5ha
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 - LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I wish to object to the current St Helens Local Plan, (LPA05 and LPA06) The plan fails on several key issues.

The Councils statement of Contaminated Land, in 2015, was 3,170 hectares, of the lowest priority contaminated land. The area of Greenbelt land to be reclassified for development in the plan is 204.6 hectares. This is 6% of the contaminated land available to the council. The Council should adopt a Brownfield first policy and use all the available brownfield land for development before considering the use of greenfield land. Developers prefer to use greenfield sites, using the argument that it enables them to deliver "affordable housing". This argument is not delivering any exceptional circumstance that would be required to remove the greenbelt protection to the land stated in the plan, (3HS and 8 HS)

The Council has no policy for bringing previously Used land that is not on the Brownfield Register on to the register. It is more than reasonable to assume that this land could be made available for use with the timescale on the plan, this is an oversight that needs to be rectified immediately,

The Council claim that they need to safeguard land for development, that will enough to satisfy the requirements for 2 or 3 local plans. The removal of greenbelt land cannot be justified, while there such an amount contaminated land that can be reclaimed for use. The time taken to execute 2 or 3 local plans, would be more than adequate to clean the contaminated land and make it ready for use.

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So, there can be no justification to destroy the prime agricultural land whilst there are such huge stocks of brownfield land that can be cleaned and made useful again.

The housing need assessment used in the plan does not follow the Standard Methodology and no exceptional circumstances case has been made to justify not using the Standard Methodology. The plan uses out of date figures from 2014 to estimate the number of houses required to be 486 per year. The latest figures from the Office of National Statistics in 2016 estimate the number of houses required to be 383 per year. So, the plan over estimates the housing requirement by 103 houses per year, which is a 20% over estimation. Furthermore, even using the inflated figures in the plan, that would equate to 1724 houses requiring 57 hectors of land. Yet table 4.5 in the plan states that 288 hectors of land will be required.

The population of St. Helens has been falling over the last 30 years. The figures in the census show that the population of the town has fallen from 190,800 in 1981 to 175,300 in 2011. That is a drop of 15,500, or 8% in the 30 years. This shows that, the economic growth predictions for St Helens are based on flawed historical data. So, the plans ambitious targets cannot be justified.

There is already a significant traffic issues, especially around Windle Island. The current work being carried out at Windle Island, is aimed and improving the flow of traffic between Liverpool and Manchester and has no bearing on the plan. The Infrastructure Delivery plan refers to the current work at Windle Island, but it does not set out any local or borough wide road improvements would be made or paid for. The plan would promote a wholly unsustainable growth in traffic. As it can be expected that most of the houses would have two cars. This amount of traffic growth does not satisfy the National Planning Policy Framework (2018).

The plan proposes to build houses in an area that are already over congested. The impact of the traffic that 1,069 houses for 8HS and 956 houses 3HS has not been addressed. It would be fair to assume an average of 2 cars be house, so that would be that would be an additional 4050 cars, using already congested narrow roads. This would clearly have an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". Which would be grounds for refusal, as stated in The National Planning Policy Framework.

Such and increase in traffic would also lead to increases in health issues caused by the emissions of such are large amount of traffic on narrow roads in a small built up areas.

The Infrastructure Development Plan does not explain the impact of the additional housing on Healthcare or Education. The plan references the current situation but does not provide any explanation on future management or funding. There is no reference to collaboration with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities.

The National Planning Policy Framework, states that "Development should only be prevented or refused on highway grounds if these would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe". Clearly the amount of traffic that would result from the plan would both be an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". The town has seen more and more out of town shopping centres open over the last few years. This has led to the last major retailer in the town centre, move to an out of town site. These sites require the use of cars and not public transport. The plan will encourage greater car use, while the Government is promoting less use of cars.

Eccleston only has one doctors surgery and that is in the process of moving closer to town, along with the only Pharmacy, so they will be difficult to access unless you have access to a car.

The Schools in Eccleston and Windle are already oversubscribed and are situated in residential streets. There are already issues with safety at the start and end of the school day. There is no crossing assistance for St Julies School, where most children must cross Springfield Lane, which is a main road that leads to the A580. There have been a number of accidents here over the years. So, adding even more traffic into this mix will increase the risk of accidents and the consequences that will bring.

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The bus routes that serve Ecclestone have been reduced over the years. So do not serve the residents sufficiently. Many elderly residents face a long walk to few bus stops for a bus service of one bus an hour. The bus service stops at 6pm residents must rely on cars.

The impact of the loss of the Grade 1 and 2 agricultural land, that is required by the plan, is not mentioned. The negative impact on farming and the distribution of jobs is not considered. There is also no consideration to the loss of biodiversity that the loss of this land would cause. There is a wide variety of wildlife in the area. Which will need be lost forever. The removal of Grade 1 and 2 farming land, whilst there is more than enough brownfield land, to meet the requirements of the plan within its 15-year term. Shows a complete failure to appreciate the current value that land has, in terms of crop production, employment and biodiversity.

I have been shocked by the cynical way in which the council has marked huge areas of greenbelt land as "Safeguarded for Development" and this publicised this by saying the land as "Safeguarded". This has led many people to falsely think that the land is safe from development. When in fact what "Safeguarded for Development" means that the land is removed from the protection enjoyed by Greenbelt land and could be used for development in 2035 or when the Local Plan is next reviewed. Given that the current plan was adopted in 2012 and reviewed in 2016. This means that the land could be developed within a 1 or 2 years. Using the term "Safeguard" to describe the removal of land from greenbelt protection to be used for development, cannot be described as positive. This is a clear attempt to mislead people into thinking the land is still protected.

By failing to use the most up to date information the plan is seriously flawed from the beginning. Ignoring the use of brownfields site, to benefit developers. Compounds this error. The brownfield sites have the capacity to for fill the needs of the plan and could do so well within the 15-year term of the plan.

The failure to collaborate with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities, means that the requirements for sustainable development are seriously undermined, as the key agencies required to provide insight to any future needs have not been consulted and therefore the plan will be incomplete and not sustainable.

Taking all these issues with the plan into account, it cannot be regarded to be justified, effective, consistent with National policy or positively prepared. Therefore, it must surely be regarded as unsound.

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 1:19:02 PM
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RO0425

Representor Details

Web Reference Number	WF0112
Type of Submission	Web submission
Full Name	Mr Mark Daly
Organisation	Mr
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 and LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

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The Council has no policy for bringing previously Used land that is not on the Brownfield Register on to the register. It is more than reasonable to assume that this land could be made available for use with the timescale on the plan, this is an oversight that needs to be rectified immediately,

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01

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03

So, there can be no justification to destroy the prime agricultural land whilst there are such huge stocks of brownfield land that can be cleaned and made useful again.

03

The housing need assessment used in the plan does not follow the Standard Methodology and no exceptional circumstances case has been made to justify not using the Standard Methodology. The plan uses out of date figures from 2014 to estimate the number of houses required to be 486 per year. The latest figures from the Office of National Statistics in 2016 estimate the number of houses required to be 383 per year. So, the plan over estimates the housing requirement by 103 houses per year, which is a 20% over estimation. Furthermore, even using the inflated figures in the plan, that would equate to 1724 houses requiring 57 hectors of land. Yet table 4.5 in the plan states that 288 hectors of land will be required.

01

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04

Such and increase in traffic would also lead to increases in health issues caused by the emissions of such are large amount of traffic on narrow roads in a small built up areas.

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06

The National Planning Policy Framework, states that "Development should only be prevented or refused on highway grounds if these would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe". Clearly the amount of traffic that would result from the plan would both be an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". The town has seen more and more out of town shopping centres open over the last few years. This has led to the last major retailer in the town centre, move to an out of town site. These sites require the use of cars and not public transport. The plan will encourage greater car use, while the Government is promoting less use of cars.

04

Eccleston only has one doctors surgery and that is in the process of moving closer to town, along with the only Pharmacy, so they will be difficult to access unless you have access to a car.

06

The Schools in Eccleston and Windle are already oversubscribed and are situated in residential streets. There are already issues with safety at the start and end of the school day. There is no crossing assistance for St Julies School, where most children must cross Springfield Lane, which is a main road that leads to the A580. There have been a number of accidents here over the years. So, adding even more traffic into this mix will increase the risk of accidents and the consequences that will bring.

04

The bus routes that serve Eccleston have been reduced over the years. So do not serve the residents sufficiently. Many elderly residents face a long walk to few bus stops for a bus service of one bus an hour. The bus service stops at 6pm residents must rely on cars. 06

The impact of the loss of the Grade 1 and 2 agricultural land, that is required by the plan, is not mentioned. The negative impact on farming and the distribution of jobs is not considered. There is also no consideration to the loss of biodiversity that the loss of this land would cause. There is a wide variety of wildlife in the area. Which will need be lost forever. The removal of Grade 1 and 2 farming land, whilst there is more than enough brownfield land, to meet the requirements of the plan within its 15-year term. Shows a complete failure to appreciate the current value that land has, in terms of crop production, employment and biodiversity. 07

I have been shocked by the cynical way in which the council has marked huge areas of greenbelt land as "Safeguarded for Development" and this publicised this by saying the land as "Safeguarded". This has led many people to falsely think that the land is safe from development. When in fact what "Safeguarded for Development" means that the land is removed from the protection enjoyed by Greenbelt land and could be used for development in 2035 or when the Local Plan is next reviewed. Given that the current plan was adopted in 2012 and reviewed in 2016. This means that the land could be developed within a 1 or 2 years. Using the term "Safeguard" to describe the removal of land from greenbelt protection to be used for development, cannot be described as positive. This is a clear attempt to mislead people into thinking the land is still protected. 03

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7. Please set out modification(s) you consider are necessary

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No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 8:53:31 AM
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RO0426

Representor Details

Web Reference Number	WF0131
Type of Submission	Web submission
Full Name	Mrs Marcelle Daly
Organisation	Mr
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

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Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
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Other documents	

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Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

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01
LPA05

204.6 hectares. This is 6% of the contaminated land available to the council. The Council should adopt a Brownfield first policy and use all the available brownfield land for development before considering the use of greenfield land. Developers prefer to use greenfield sites, using the argument that it enables them to deliver "affordable housing". This argument is not delivering any exceptional circumstance that would be required to remove the greenbelt projection to the land stated in the plan, (3HS and 8 HS)

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Clearly the amount of traffic that would result from the plan would both be an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe".

The plan proposes to build houses in an area that are already over congested. To build 1,089 houses in 8HS would conceivably add a further 2,000 cars and building 956 houses in 3HS would add a further 1,000 cars. These areas do not have the infrastructure to handle this amount of traffic. This would inevitably lead increased dangers for road users and pedestrians, as they try to navigate their way around.

Such and increase in traffic would also lead to increases in health issues caused by the emissions of such are large amount of traffic on narrow roads in a small built up areas.

The Infrastructure Development Plan does not explain the impact of the additional housing on Healthcare or Education. The plan references the current situation but does not provide any explanation on future management or funding. There is no reference to collaboration with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities.

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02
LPA06

The town has seen more and more out of town shopping centres open over the last few years. This has led to the last major retailer in the town centre, move to an out of town site. These sites require the use of cars and not public transport. The plan will encourage greater car use, while the Government is promoting less use of cars.

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The failure to collaborate with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities, means that the requirements for sustainable development are seriously undermined, as the key agencies required to provide insight to any future needs have not been consulted and therefore the plan will be incomplete and not sustainable.

The removal of Grade 1 and 2 farming land, whilst there is more than enough brownfield land, to meet the requirements of the plan within its 15-year term. Shows a complete failure to apriate the current value that land has, in terms of crop production, employment and biodiversity.

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7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 9:19:18 PM
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RO0427

Representor Details

Web Reference Number	WF0133
Type of Submission	Web submission
Full Name	Mr Gerry Daly
Organisation	Mr
Address	[REDACTED]
Agent Details	[REDACTED]

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 and LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Dear Sir

I wish to object to the current St Helens Local Plan, (LPA05 and LPA06) The plan fails on several key issues.

- ☒ Fails to use accurate figures for housing targets.
- ☒ Fails to consider the use of "Brownfield" sites.
- ☒ Fails to provide a sustainable transport plan.
- ☒ Fails the requirement for sustainable development.
- ☒ Fails to consider food security.
- ☒ Fails to be transparent.

Fails to use accurate figures for housing targets ⁰¹

The population of St. Helens has been falling over the last 30 years. The figures in the census show that the population of the town has fallen from 190,800 in 1981 to 175,300 in 2011. That is a drop of 15,500, or 8% in the 30 years.

The housing need assessment used in the plan does not follow the Standard Methodology and no exceptional circumstances case has been made to justify not using the Standard Methodology.

The economic growth predictions for St Helens are based on flawed historical data. So, the plans ambitious targets cannot be justified.

The plan uses out of date figures from 2014 to estimate the number of houses required to be 486 per year. The latest figures from the Office of National Statistics in 2016 estimate the number of houses required to be 383 per year. So, the plan over estimates the housing requirement by 103 houses per year, which is a 20% over estimation. Furthermore, even using the inflated figures in the plan, that would equate to 1724 houses requiring 57 hectors of land. Yet table 4.5 in the plan states that 288 hectors of land will be required.

The borough also has 2,815 houses that have been vacant for over six months. The plan does not make any provision for bringing these houses back into use.

Fails to consider the use of "Brownfield" sites

The plan fails to consider the Brownfield and Previously Developed Land that is not available or included in the Brownfield register. The Council, along with the Liverpool City region and other neighbouring Councils of no policy for bringing Brownfield or previously Used land that is not on the Brownfield Register on to the register. This is an unacceptable oversight. It is more than reasonable to assume that this land could be made available for use with the timescale on the plan

The Councils statement of Contaminated Land, in 2015, was 3,170 hectors, of the lowest priority contaminated land. The area of Greenbelt land to be reclassified for development in the plan is 204.6 hectors. This is 6% of the land could be reclaimed for housing. The Contaminated land will have to be cleaned at some point so there is no justification not to include this in the plan.

The Council claim that they need to safeguard land for development, that will consider planning 2 or 3 local plans. The removal of greenbelt land cannot be justified, while there such an amount contaminated land that can be reclaimed for use, during the same time period required for 2 or 3 local plans. There can be no justification to destroy the prime agricultural land whilst there are such huge stocks of brownfield land that can be cleaned and made useful again.

It is both morally right make use to reuse brownfield sites, as the land will have to be made useful again at some point. And it makes long term economic sense, as the brown field sites have the benefit of the existing infrastructure. The council should adopt a policy of Brownfield land first.

The plan seems to suggest that the use of greenfield sites is required, so that developers would have lower costs and therefore could deliver "affordable housing". This view would not provide an "exceptional circumstance" that could be used to justify the removal of this land from the protection provided by greenbelt status. The plans aim should be to benefit the people of St Helens not delevopers.

Fails to provide a sustainable transport plan

There is already a significant traffic issues, especially around Windle Island. The current work being carried out at Windle Island, is aimed and improving the flow of traffic between Liverpool and Manchester and has no bearing on the plan. The Infrastructure Delivery plan refers to the current work at Windle Island, but it does not set out any local or borough wide road improvements would be made or paid for. The plan would promote a wholly unsustainable growth in traffic. As it can be expected that most of the houses would have two cars. This amount of traffic growth does not satisfy the National Planning Policy Framework (2018).

The National Planning Policy Framework, states that "Development should only be prevented or refused on highway grounds if these would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe".

Clearly the amount of traffic that would result from the plan would both be an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe".

From Windle the route into the town centre, along Rainford Road and Dentons Green. Are already heavily congested as is also the route from traffic coming into town from Rainford and any other traffic coming into town from the East Lanc's Road. The route into town from Eccleston uses Millfield's and Knowsley Road. This route has already two developments at Eccleston Grange, which

will deliver 626 houses and a new development, on the site of the former garage, further down on Knowsley Road. The effects of these developments have not been considered.

Fails the requirement for sustainable development

The plan proposes to build houses in an area that is already becoming over congested and has a very poor infrastructure. Building more houses would only magnify this problem. The Infrastructure Development Plan does not explain the impact of the additional housing on Healthcare or Education. The plan references the current situation but does not provide any explanation on future management or funding. There is no reference to collaboration with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities.

Eccleston only has one doctors surgery and that is in the process of moving closer to town, along with the only Pharmacy, so they will be difficult to access unless you have access to a car.

The Schools in Eccleston and Windle are already over subscribed and are situated in residential streets. There are already issues with safety at the start and end of the school day. So, adding even more traffic into this mix will increase the risk of accidents and the consequences that will bring. The bus routes that serve Eccleston have been reduced over the years. So do not serve the residents sufficiently. Many elderly residents face a long walk to few bus stops for a bus service of one bus an hour. The bus service stops at 6pm residents have to rely on cars.

The town has seen more and more out of town shopping centres open over the last few years. This has led to the last major retailer in the town centre, move to an out of town site. These sites require the use of cars and not public transport. The plan will encourage greater car use, while the Government is promoting less use of cars.

The increase in traffic proposed in the plan will inevitably lead to a reduction to air quality an increase in noise pollution, with the harmful effects on health and wellbeing issues will cause.

Fails to consider food security

The impact of the loss of the Grade 1 and 2 agricultural land, that is required by the plan, is not mentioned. The negative impact on farming and the distribution of jobs is not considered. There is also no consideration to the loss of biodiversity that the loss of this land would cause. There is a wide variety of wildlife in the area. Which will need be lost forever.

Fails to be transparent

02 I have been shocked by the cynical way in which the council has marked huge area's of greenbelt land as "Safeguarded for Development" and this publicised this by saying the land as "Safeguarded". This has led many people to falsely think that the land is safe from development.

When in fact what "Safeguarded for Development" means that the land is removed from the protection enjoyed by Greenbelt land and could be used for development in 2035 or when the Local Plan is next reviewed. Given that the current plan was adopted in 2012 and reviewed in 2016. This means that the land could be developed within a 1 or 2 years

By failing to use the most up to date information the plan is seriously flawed from the very start. This error is further compounded by disregarding the use of Brownfield sites. That have the capacity to fill the needs of the plan and could do so well within the 15-year term of the plan. The impact of the traffic that 1,069 houses for 8HS and 956 houses 3HS has not been addressed. It would be fair to assume an average of 2 cars be house, so that would be that would be an additional 4050 cars, using already congested narrow roads. This would clearly have an "Unacceptable impact on highway safety" and the "residual cumulative impacts on the road network would be severe". Which would be grounds for refusal, as stated in The National Planning Policy Framework.

The failure to collaborate with the Hospital Trust, local Clinical Commissioning Groups or Education Authorities, means that the requirements for sustainable development are seriously undermined, as the key agencies required to provide insight to any future needs have not been consulted and therefore the plan will be incomplete and not sustainable.

The removal of Grade 1 and 2 farming land, whilst there is more than enough brownfield land, to meet the requirements of the plan within its 15-year term. Shows a complete failure to appraise the current value that land has, in terms of crop production, employment and biodiversity.

Using the term "Safeguard" to describe the removal of land from greenbelt protection to be used for development, cannot be described as positive. This is a clear attempt to mislead people into thinking the land is still protected.

Taking all these failures in the current plan into account, it cannot be regarded to be justified, effective, consistent with National policy or positively prepared. As a consequence, it must surely be regarded as unsound.

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 9:14:52 PM
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RO0428



St. Helens
Council

① - LPA04
② - LPA05
209
PFO189

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD
01 MAR 2019
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Sarah

Last Name: Daniel

Organisation/company: _____

Address: 8 The Fairways,
Ashton Cross, Ashton-U-
Wigan

Postcode: WN4 04V

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Signature: _____

Date: 25th Feb 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA04	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Sites	2EA, 5EA, 6EA								
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>Don't know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of urban land. Using greenbelt fails to encourage this.</p> <p>The council has already granted planning permission in the Greenbelt in respect of site 2EA - Florida Farm North.</p>

High volumes of predicted traffic will be added

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the green belt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
LPA-05									
Site 24A									
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>don't know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>- Housing in this area isn't sustainable because of the lack of school places etc.</p> <p>- One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land</p>	

Please continue on a separate sheet if necessary

- The access site is ~~is~~ inadequate.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the
proposed removal from the
Greenbelt.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0429

PFO190

① - LPA04
② - LPA05 210

Ref: LPSD
01 MAR 2019
(For official use only)



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title: _____
First Name: <u>PAUL.</u>	First name: _____
Last Name: <u>DANIEL</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>8, THE FAIRWAY P.</u> <u>ASHTON CROSS</u>	Address: _____
Postcode: <u>WN4 0YX</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: _____	Date: <u>25/2/19.</u>
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email) ☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

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post to:

Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
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setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy SITE 8	LPA 09	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
EAD 2 EAD 5 EAD 6									
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	DONT KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

HIGH VOLUME OF TRAFFIC
NOT JUSTIFIED THE COUNCIL SHOULD BE
PUT TO STRICT PROOF OF THE NEED OF
THIS TYPE OF DEVELOPMENT IN THIS
POSITION AND OF THIS SCALE

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM PROPOSED
REMOVAL FROM THE GREEN BELT.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy	LPA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
SITE OS									
ZHA									
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
<p>HOUSING IN THIS AREA IS NOT SUSTAINABLE BECAUSE OF LACK OF SCHOOL DOCTORS BUS ROUTES AND OTHER SERVICES</p>	

②

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE
PROPOSED REMOVAL FROM THE
GREEN BOOK.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate
at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Please keep a copy for future reference.

RO0430



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

1052

13 MAY 2019

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Joyce	First name:
Last Name: Darbyshire	Last Name:
Organisation/company:	Organisation/company:
Address: 160 Grafton Lane	Address:
Postcode:	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

22-3-19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO0431



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR DARNBROUGH</u>	Title: _____
First Name: <u>JOHN</u>	First name: _____
Last Name: <u>DARNBROUGH</u>	Last Name: _____
Organisation/company: <u>RETIRED</u>	Organisation/company: _____
<u>76 ELGIN AVE</u>	_____
Address: <u>ASHTON-IN-MAKERFIELD</u>	Address: _____
<u>WIGAN</u>	_____
Postcode: <u>WN4 0RH</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>11/3/2019</u>
------------------------------	------------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: **www.sthelens.gov.uk/localplan**

If you still need assistance, you can contact us via:

Email: **planningpolicy@sthelens.gov.uk**

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **www.sthelens.gov.uk/localplan**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LPA06 Site 1HS		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The council should be put to strict proof of population estimates. The population of St Helens has been in decline since 1981, where are all the extra people coming from. The purpose of release of greenbelt will cause significant harm to the purposes of the greenbelt. The purpose of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other derelict land. Housing in this area isn't sustainable because of lack of school places, doctors surgery and bus routes.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this Panel from the proposed
removed from the green belt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0432



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS C A DARNBROUGH</u>	Title: _____
First Name: <u>CAROL ANN</u>	First name: _____
Last Name: <u>DARNBROUGH</u>	Last Name: _____
Organisation/company: <u>RETIRED</u>	Organisation/company: _____
Address: <u>76 ELGIN AVE</u> <u>ASHTON-IN-MAKERFIELD</u> <u>LOUGAN</u>	Address: _____
Postcode: <u>WN4 0RH</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>11/3/2019</u>
------------------------------	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LPA06 Site IHS		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Housing in this area isn't sustainable because of the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. The population of St Helens has been in decline since 1981, where is the population coming from to fill all these new houses.</p> <p>And part of our townwood is a nice village surrounded by fields. That should countryside here should stay, instead of being decimated by new housing. If new housing is needed in St Helens then they should build on brown field sites of which there are plenty.</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the green belt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0433



① - LPA06
② - Statement of
Common Ground

LPA06 - Site 145
PFO261

Ref: LPSD

04 MAR 2019
(For official use only)

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MS

First Name: JANET

Last Name: DAVENPORT

Organisation/company:

Address: 506 CLAREWOOD ROAD

NORTH ASHTON

NR WIGAN

Postcode: WN4 0XH

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 20/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

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or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06 Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Not justified - need to strictly evidence population estimator. Population has been in decline since 1981. Where are the extra persons coming from.</p> <p>One of the purposes of greenbelt is to assist in urban regeneration by recycling derelict and other urban land. Using greenbelt land fails to encourage this.</p> <p>The release of greenbelt will cause significant harm to the purpose of greenbelt.</p> <p>Housing in this area isn't sustainable due to lack of school places, doctors surgeries, other community health services, bus routes and other services. Cars on the roads will increase.</p> <p>There is no statement of common ground with neighbouring authorities.</p> <p>What about the wildlife.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the green belt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.



St. Helens
Council

① - LPA05
② - Statement of Common Ground
LPA05 - Site 14A

PFO262

Ref: LPSD

MAR 2019
(For official use only)

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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www.sthelens.gov.uk/localplan

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MS

First Name: JANET

Last Name: DAVENPORT

Organisation/company:

Address: 506 GARSWOOD ROAD

NORTH ASHTON

NE WILKIN

Postcode: WNA 0XH

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature: Date: 20/02/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

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If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LP A05 SITE IMA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Not justified - need to strictly evidence population estimates. Population has been in decline since 1981, where are the extra persons coming from.

One of the purposes of greenbelt is to assist in urban regeneration by recycling derelict and other urban land. Using greenbelt land fails to encourage this.

The release of greenbelt will cause significant harm to the purpose of greenbelt.

Housing in this area isn't sustainable due to lack of school places, doctors, surgeries, other community local services, bus routes and other services. Cars on the roads will increase.

The access to the site will be either Billinge road or Garswood road and these would be inadequate. Highways works must be funded by the developer not the Council tax payer.

There is no agreement or common ground with neighbouring authorities. What about the wildlife.

Please continue on a separate sheet if necessary

①
②

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0434



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
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This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

13 MAY 2019

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: ROBERT	First name:
Last Name: DAVENPORT	Last Name:
Organisation/company: /	Organisation/company:
Address: 36 THE PASTURES ST. HELENS	Address:
Postcode: WA9 4ZB	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 02/05/19
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO0435



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than 5pm on **Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: VICTORIA	First name:
Last Name: DAVENPORT	Last Name:
Organisation/company:	Organisation/company:
Address: 36 THE PASTURES ST. HELENS	Address:
Postcode: WA9 4ZB	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 02/05/19
-----------------------	----------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO0436

Representor Details

Web Reference Number	WF0065
Type of Submission	Web submission
Full Name	Mr Paul Davenport
Organisation	
Address	23 Begonia Gardens Bold St Helens WA9 4FT
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Yes, LPA02, 03 & 05
Paragraph / diagram / table	
Policies Map	Yes
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Such a huge increase in available homes will only have a negative impact all near all aspects of local infrastructure and even quality of living.

There are already multiple housing developments in very local areas and there is a real risk of saturating the housing market in this area, reducing prices of homes therefore negatively impacting the wider economy of the town, overall reputation and living conditions socially.

Local roads cannot handle such an increase in traffic volume that would be caused and the allowed development should be greatly reduced from the current plans.

7. Please set out modification(s) you consider are necessary

The development should reduce the number of homes it proposes to build and only be completed if and when local infrastructure can cope with the increased local population.

Large single developments should be implemented in stages to prevent sudden and harse burdens on the area as a whole and then assess the actual need/demand for more homes at each stage of development to avoid saturation of the housing market and collapse of local house prices. St Helens is at risk of becoming a socially challenged area already without this increased pressure from an abundance of available homes

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/13/2019 2:07:25 PM
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RO0437



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

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Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>LAURIE</u>	First name:
Last Name: <u>DAVERIN</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>16 IBERIS Gdns NEW BOLD, ST. HELENS</u>	Address:
Postcode: <u>WA9 4FY</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: <u>29/04/19</u>
-----------------------	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

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RO0438



St.Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (I.e. Comment) Form**

Ref: LPSD

(For official use only)

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Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

13 MAY 2019
1769

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>MARK</u>	First name:
Last Name: <u>DAVERIN</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>16 IBERIS GARDENS</u> <u>NEW BOWL ST HELENS</u>	Address:
Postcode: <u>WA9 4FY</u>	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 29/4/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email) No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO0439



St Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (I.e. Comment) Form**

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: JESSICA	First name:
Last Name: DAVERIN	Last Name:
Organisation/company:	Organisation/company:
Address: 16 IBERIS GARDENS NEW BOLD, St Helens	Address:
Postcode: WA9 4PY	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 29/04/19
-----------------------	----------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☒

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO0440



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: <u>BOLD + CLOCK FACE ACTION GROUP</u>
First Name: <u>SUSAN</u>	First name: _____
Last Name: <u>DAVEY</u>	Last Name: _____
Organisation/company: <u>BOLD + CLOCK FACE ACTION GROUP</u>	Organisation/company: _____
Address: <u>12 FRENCHFIELD CRES</u> <u>CLOCK FACE</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA9 4FZ</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>11/3/19</u>
-----------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	✓	Paragraph / diagram / table		Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				Draft Greenbelt Review 2016 – Appendix 4 PCPA 2004 section 20(5)(a) c, d, e					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
<i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
<i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not legally compliant because the local development scheme (LDS) for St Helens refers to the adherence to the Statement of Community Involvement 2013. Paragraph 3.12 states that it should "be well targeted and reach out to the seldom heard groups", which it didn't do. We live adjacent to the land to be developed and were not informed by the local council via letter. One notice had been posted on a lamppost on Gorsey Lane, which residents rarely walk past, after the consulting period on the revised plans had finished, nothing else. For the same reasons, this also contravenes section 36 (Regulations) of the Planning and Compulsory Purchase Act 2004, part 2 c, d and e, for the requirements about giving notice and publicity, inspection by the public of the local development document and the nature and extent of consultation with the public.

The NPPF paragraph 72 states that policy making authorities should work with the support of their communities to identify suitable locations where development can meet needs in a sustainable way, and supported by the necessary infrastructure and facilities. At present, the council do not have support of their communities and this level of development in one parish of St Helens is unsustainable. There

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should be sufficient access to services, yet schools and doctors to name just two local services are full.

It is not justified and is unsound because the proposals are not consistent with National Policy. The proposals contravene NPPF (2019) Section 13 which states in paragraph 134 that Green Belt should be protected against unrestricted urban sprawl and encroachment into the countryside. Furthermore insufficient justification is given for the exceptional need to release Green Belt for housing. Releasing the land from Green Belt operates at odds to the NPPF, it does promote the urban regeneration through recycling of derelict and other urban land.

The NPPF (2019) Paragraph 137 states:

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. ..."

- (1) St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017).
- (2) On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use.
- (3) There is no substantive evidence to suggest that there is a need to remove such a large site as 4HA from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised. The regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.

The NPPF (2019) paragraph 177 states:

"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."

Yet,

- (1) The Sustainability Assessment (SA) site assessment for 4HA scores "Likely to generate negative effects" for
 - a. SA1. To protect and enhance biodiversity and
 - b. SA2. To protect and improve land quality in St Helens
- (2) The Priority species of Grassland Assemblage - Farmland Birds, are present at level 3 for the whole of HA4 (MAGIC database, March 2019), in particular Local BAP species Lapwing and Skylark. Brown Hare is also presumed to be present. These species cannot be translocated nor loss of their habitat mitigated against. **Their presence is a material consideration.**
- (3) Removing HA4 from the Green Belt, let alone allowing housing allocation, will make the protection of these habitats and species much harder.

Additionally, it is unsound because there is no commonality of methodology from one year to the next to review Green Belt, it has fundamentally and substantially changed the results. The draft Green Belt Review 2016 assessed the parcel of land off Gorsey Lane against Green Belt purposes in terms of its Green Belt function as medium but then reduced them in 2018 with no change to the surrounding areas of land use. The parcels of land had also been divided up differently with insufficient explanation in the supporting documentation as to why this had changed or how Purpose 1, 2 and 3 had been assessed differently. Essentially no explanation provided why this lands purpose had dropped to make it favourable for removal from Green Belt. Additionally the arguments put forward to protect land to the south of Gorsey Lane can be equally applied to land to the north.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove or significantly reduce the amount of Green Belt released in the 2020-2035 because there is insufficient justification of exceptional circumstances to validate it, when taking into alternatives available in St Helens and the NPPF. Only once alternative urban and derelict land used then to release this land for development.

To significantly reduce the amount of housing allocation in Bold and Clock Face, and distribute it evenly throughout St Helens so not to radically change the make up of the rural nature and local community.

To open up the consultation process on the revised plans ^{to ensure} as the best effort made to engage with the community to develop a sustainable plan that meets the needs of the local community.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.
After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

RO0441



St.Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

① GCV
② GCV

PIR 4H1

③ LPA02 ⑤ GBR
④ LPA05

PF1273

Ref: LPSD

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: BRIAN

Last Name: DAVEY

Organisation/company: BOLD + CLOCK
FACE ACTION GROUP

Address: 12 FRENCHFIELD CRES
CLOCK FACE
ST HELENS

Postcode: WA9 4FZ

Tel No: [REDACTED]

Mobile No: [REDACTED]

Email: [REDACTED]

2. Your Agent's Details (if applicable)

Title: BOLD + CLOCK FACE ACTION

First name: GROUP

Last Name: [REDACTED]

Organisation/company: [REDACTED]

Address: [REDACTED]

Postcode: [REDACTED]

Tel No: [REDACTED]

Mobile No: [REDACTED]

Signature [REDACTED]

Date: 11/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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post to:

Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Development Scheme does your comment relate?							
Policy	<input checked="" type="checkbox"/>	Paragraph / diagram / table		Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Draft Greenbelt Review 2016 – Appendix 4 PCPA 2004 section 20(5)(a) c, d, e			

4. Do you consider the Local Development Scheme to be:			
<i>Please read the Guidance Note for this form before completing it.</i>			
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
Complies with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	

Please tick as appropriate

5. If you consider the Local Development Scheme to be:	
<i>Please read the Guidance Note for this form before completing it.</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Development Scheme to be not legally compliant or is unsound or fails to comply with the duty to cooperate.	
If you wish to support the Local Development Scheme, please also use this box to set out your comments.	

Not legally compliant because the local development scheme (LDS) for St Helens refers to the adherence to the Statement of Community Involvement 2013. Paragraph 3.12 states that it should "be well targeted and reach out to the seldom heard groups", which it didn't do. We live adjacent to the land to be developed and were not informed by the local council via letter. One notice had been posted on a lamppost on Gorsey Lane, which residents rarely walk past, after the consulting period on the revised plans had finished, nothing else. For the same reasons, this also contravenes section 36 (Regulations) of the Planning and Compulsory Purchase Act 2004, part 2 c, d and e, for the requirements about giving notice and publicity, inspection by the public of the local development document and the nature and extent of consultation with the public.

The NPPF paragraph 72 states that policy making authorities should work with the support of their communities to identify suitable locations where development can meet needs in a sustainable way, and supported by the necessary infrastructure and facilities. At present, the council do not have support of their communities and this level of development in one parish of St Helens is unsustainable. There

①

②

should be sufficient access to services, yet schools and doctors to name just two local services are full.

It is not justified and is unsound because the proposals are not consistent with National Policy. The proposals contravene NPPF (2019) Section 13 which states in paragraph 134 that Green Belt should be protected against unrestricted urban sprawl and encroachment into the countryside. Furthermore insufficient justification is given for the exceptional need to release Green Belt for housing. Releasing the land from Green Belt operates at odds to the NPPF, it does promote the urban regeneration through recycling of derelict and other urban land.

The NPPF (2019) Paragraph 137 states:

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. ..."

- (1) St Helens has 936 "long term empty" housing units (FOI request January 2019), 2853 "unused" units (Council Tax returns 2018), and very many brownfield sites (St Helens' brownfield register 2017).
- (2) On 27th February 2019, St Helens Council announced it was taking part in a national pilot to bring small brownfield sites back into use.
- (3) There is no substantive evidence to suggest that there is a need to remove such a large site as 4HA from the Green Belt to solve a current or future need for housing - and this should not happen until all other brownfield avenues have been utilised. The regeneration of brownfield sites in central St Helens (in a similar way to that done to the mills and warehouses of Inner Manchester and Birmingham - and the docklands regeneration in Liverpool) would provide a much more sustainable and attractive housing stock with much better links to public transport than are available in HA4 or similar rural land parcels.

The NPPF (2019) paragraph 177 states:

"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitat's site."

Yet,

- (1) The Sustainability Assessment (SA) site assessment for 4HA scores "Likely to generate negative effects" for
 - a. SA1. To protect and enhance biodiversity and
 - b. SA2. To protect and improve land quality in St Helens
- (2) The Priority species of Grassland Assemblage - Farmland Birds, are present at level 3 for the whole of HA4 (MAGIC database, March 2019), in particular Local BAP species Lapwing and Skylark. Brown Hare is also presumed to be present. These species cannot be translocated nor loss of their habitat mitigated against. **Their presence is a material consideration.**
- (3) Removing HA4 from the Green Belt, let alone allowing housing allocation, will make the protection of these habitats and species much harder.

Additionally, it is unsound because there is no commonality of methodology from one year to the next to review Green Belt, it has fundamentally and substantially changed the results. The draft Green Belt Review 2016 assessed the parcel of land off Gorsey Lane against Green Belt purposes in terms of its Green Belt function as medium but then reduced them in 2018 with no change to the surrounding areas of land use. The parcels of land had also been divided up differently with insufficient explanation in the supporting documentation as to why this had changed or how Purpose 1, 2 and 3 had been assessed differently. Essentially no explanation provided why this lands purpose had dropped to make it favourable for removal from Green Belt. Additionally the arguments put forward to protect land to the south of Gorsey Lane can be equally applied to land to the north.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matters you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. A written statement if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove or significantly reduce the amount of Green Belt released in the 2020-2035 because there is insufficient justification of exceptional circumstances to validate it, when taking into alternatives available in St Helens and the NPPF. Only once alternative urban and derelict land used then to release this land for development.

To significantly reduce the amount of housing allocation in Bold and Clock Face, and distribute it evenly throughout St Helens so not to radically change the make up of the rural nature and local community.

To open up the consultation process on the revised plans ^{to ensure} ^{is} as the best effort made to engage with the community to develop a sustainable plan that meets the needs of the local community.

Please continue on a separate sheet if necessary

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<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

12 **BRIAN + SUSAN DAVEY**
Frenchfields Crescent
Bold
St Helens
Merseyside
WA9 4FZ

Dear Sir / Madam,

As an extremely concerned resident of Bold, I write in response to the recently published St Helens Borough Local Plan 2020 – 2035. From the outset I strongly oppose this plan.

My rationale is due to several significant factors,

- Savid Javid Secretary of State for Home and Communities and Local Government has stated in Parliament that 'Greenbelt is absolutely sacrosanct' This was echoed in the conservative manifesto.
- Greenbelts primary purpose is to prevent urban sprawl, but in doing this it provides countryside to the people. It has a huge environmental value. In the face of climate change it has an increasingly important role in storing carbon and preventing flooding and is a vital economic resource for food security and soil protection.
- Britain has lost half of its wildlife a 56% decline of farmland birds between 1970 and 2015. Since 2016 the number of critically endangered species in the UK has reached 165. The UK now considered one of the most nature depleted countries in the world. These fields are home to many of these species, and development of these fields will decimate their habitat.
- It should be noted that for every new house built on greenbelt land it is estimated that between four and seven additional car trips would be generated per week.
- In St Helens 936 houses have been classed as long-term empty. St Helens Council Tax figures from October 2018 show that there were 2853 unused homes in the borough.

In view of the above, the following areas,

LPSD 4HA 2988 Houses and **LPSD 5HA 569 Houses**, must be removed from the Local Borough Plan.

Yours faithfully,

26 FEB 2019

RO0442



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: JOHN

Last Name: DAVIES

Organisation/company:

Address: 25 WHITEHOUSE CLOSE

HAYDOCK

ST. HELENS

Postcode: WA11 0JW

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 25-2-19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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Town Hall
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St Helens
WA10 1HP**

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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**Please use a separate copy of Part B
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PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy <i>LP</i> <i>A05</i> <i>SITE</i> <i>2HA</i>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>DON'T KNOW</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p><i>HOUSING IN THIS AREA ISNT SUSTAINABLE BECAUSE OF LACK OF SCHOOL PLACES, DOCTORS SURGERIES TRAFFIC CONGESTION. ALREADY, ACCESS TO THE SITE IS INADEQUATE A JUNCTION AT LIVERPOOL RD + VICARAGE RD WOULD BE A JOKE CONGESTION AGAIN GENERATED AT THIS POINT. THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES, WHERE ARE ALL THE EXTRA PEOPLE COMING FROM.</i></p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED
REMOVAL FROM THE GREENBELT

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

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01 MAR 2019

St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>JOHN</u>	First name:
Last Name: <u>DAVIES</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>25 WHITEHOUSE CLOSE</u>	Address:
<u>HAYDOCK</u>
<u>ST. HELENS</u>
Postcode: <u>WA11 0JW</u>	Postcode:
[Redacted]	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: <u>25.2.19</u>
-----------------------	----------------------

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy LPA 04 SITES 2EA 5EA 6EA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No DON'T KNOW
Sound?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>THE COUNCIL SHOULD BE AT TO STRICT PROOF OF THE NEED FOR THIS TYPE OF DEVELOPMENT IN THIS POSITION AND ON THIS SCALE. ENOUGH W'ISE ALREADY, HAYDOCK IS BEING CONVERTED TO AN INDUSTRIAL ESTATE.</p> <p>HIGH VOLUMES OF TRAFFIC WILL ADD TO THE ALREADY OVER CAPACITY ON THE HIGHWAYS IN THE VICINITY.</p>
--

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

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--

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Please keep a copy for future reference.

RO0443

13 MAR 2019

Ref: LPSD



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title: _____
First Name: <u>JOANNE</u>	First name: _____
Last Name: <u>DAVIES</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>17 LANGHAM RD</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0SG</u>	Postcode: _____
Tel No: _____	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: _____	Date: <u>23/2/19</u>
------------------	----------------------

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☒ Yes (via email)

☐ No

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¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

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PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?									
Policy	LPA06 SITE WHA IHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
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Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.

It is not justified. The council should be put to strict proof in its estimates. St Helens population has been in decline since 1981. Where are the extra people coming from?
 What of recycling derelict & other urban land?
 using greenbelt discourages this.
 Housing in this area isn't sustainable because of the lack of school places, doctors surgeries and services.
 The highways are ill suited to such a development.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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First Name: <u>JOANNE</u>	First name: _____
Last Name: <u>DAVIES</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>17 LANGHOLM ROAD</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0SG</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>6/3/19</u>
------------------	---------------------

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Other documents (please name document and relevant part/section)									

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Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>NOT JUSTIFIED. THE POPULATION OF ST HELENS IS IN DECLINE. THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES.</p> <p>ONE PURPOSE OF THE GREENBELT IS TO ASSIST IN REGENERATION OF DERELICT & URBAN LAND. USING GREENBELT DEFEATS THIS.</p> <p>THERE IS NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES.</p>
--

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED
REMOVAL FROM THE GREEN BELT.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

790 13 MAR 2019

Ref: LPSD



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title: _____
First Name: <u>JOANNE</u>	First name: _____
Last Name: <u>DAVIES</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>17 LANGHAM ROAD</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0SG</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: <u>1 77</u>	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>6/3/19</u>
------------------	---------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
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or by email to:

planningpolicy@sthelens.gov.uk

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Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA04 SITE 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>THE RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSES OF THE GREENBELT.</p> <p>THE COUNCIL HAS ALREADY GRANTED PERMISSION IN THE GREENBELT IN RESPECT OF SITE 2EA - FLORIDA FARM NORTH. HIGH VOLUMES OF PREDICTED TRAFFIC WILL ADD TO THE EXISTING OVER CAPACITY ON THE HIGHWAYS IN THE VICINITY.</p>
--

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED
REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

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No, I do not wish to participate
at the oral examination

Yes, I wish to participate at the oral examination

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MISS</u>	Title: _____
First Name: <u>JOANNE</u>	First name: _____
Last Name: <u>DAVIES</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>17 LANGHOLM RD</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0SG</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>23/2/19</u>
-----------------------	----------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

¹ view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

RETURN DETAILS

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St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

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planningpolicy@sthelens.gov.uk

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
SITE	LPA06								
IHS									
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

It is not justified. The council should be put to strict proof in its estimates. St Helens population has been in decline since 1981. Where are the extra people coming from?
What of recycling derelict & other urban land? using green belt discourages this.
Housing in this area isn't sustainable because of the lack of school places, Doctors surgeries and services. The highways are ill suited to such a development.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM
THE PROPOSED REMOVAL
FROM THE GREENBELT

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓

No, I do not wish to participate
at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0444



St. Helens
Council

876
**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

24 APR 2019
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

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This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MS	Title:
First Name: LYNNE	First name:
Last Name: DAVIES.	Last Name:
Organisation/company:	Organisation/company:
Address: 410 17 LANGHOLM RD.	Address:
Postcode:	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 3.01.19.
-----------------------	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St. Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
PA05						114A			
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Garswood Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. I have lived in Garswood/Simms Lane End for seventy years. There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HA. This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

GH:

20A92

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
LP A06					IHS				
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
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N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

2H1

20481

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No , I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes , I wish to participate at the oral examination
--	--	--------------------------	--

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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

RO0445

07 MAR 2019

46, Crantock Grove,
Windle,
ST.HELENS,
Merseyside.
WA10 5EJ

FAO Government Planning Inspector,
Local Plan,
St.Helens Council,
Town Hall,
Victoria Square,
ST.HELENS,
Merseyside.
WA10 1HP

Monday, 4th March 2019

Ref. Response to St.Helens Local Plan 2020-2035 (Submission Draft)

Dear Sir or Madam,

This letter represents my objections to the St.Helens Local Plan (2018). I object to the decisions made regarding Housing Need (LPA05) and the Green Belt Review.

In my view the Local Plan is not justified as it is based on flawed methodology. The housing targets proposed are based on outdated statistics i.e. ONS2014, when there are more accurate statistics available as in ONS2016. The ONS2014 prediction for housing need is 486 houses per year while ONS2016 predicts a lower number of 393 houses. This lower figure, together with the Brownfield Register availability of 5808 houses, would lower the identified need and therefore reduce the need for building on Green Belt.

I believe the Local Plan not to be effective and therefore not deliverable for a number of reasons:

(i) It promotes unsustainable traffic growth as the development of site HS8 with 1000 houses, releasing 1800 cars on to the roads in an area already beset with traffic problems, would exacerbate traffic difficulties. The IDP (Infrastructure Development Plan) refers to current road improvements but does not indicate how road improvements are to be made or funded.

(ii) With this increase in traffic there would be a negative impact on air quality, noise, tranquillity and general health as the Local Plan does not promote less vehicle dependency with its proposals for edge of town developments.

(iii) The IDP doesn't detail the impact on Healthcare and Education; how this will be managed and funded is vague or not included.

The Local Plan is not consistent with National Policy as it does not satisfy the following:

(i) The criteria for sustainable transport as the plan promotes increased car dependency remote from transport hubs in the 'out of town' proposed building sites.

(ii) Sustainable housing. The targets proposed are based on aspirational and unrealistic growth predictions.


(iii) Effective land use by concentrating on Green Space development as opposed to town centre development with high densities.

(iv) Food security by ignoring Agriculture Land Quality. Loss of Grade 1 and 2 Agricultural land that comprises most allocated and safeguarded sites is not mentioned in the Local Plan, nor the negative impact on farm and distributive jobs.

When the negative responses to these criteria are examined it is evident that there are no 'exceptional circumstances' to change Green Belt boundaries. The economic analysis is questionable and other reasonable alternatives to the release of Green belt must be fully explored. In my opinion there is no justified requirement to release Green Belt and, therefore, the Local Plan must be amended and modified.

Yours Sincerely,

Ralph Davies



RO0446

Representor Details

Web Reference Number	WF0309
Type of Submission	Web submission
Full Name	Mrs Carole Dawson
Organisation	
Address	44 Hawthorn Drive Eccleston St Helens WA10 5EF
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Infrastructure Delivery Plan is weak. In the areas suggested for housing development there are already schools shortages and major transport problems. In particular, 8HS sits beside the main arterial route from Liverpool to Manchester (A580) and will cause further traffic problems as well as removing the green lung that currently protects the locality from the pollution caused by this road. The Plan is not effective.

The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

Residential vehicle ownership in St Helens will grow significantly with this plan. As most of the City Regional and adjoining authorities are adopting a similar growth strategy this will be mirrored across the whole of the North West.

The Northwest has recently been identified as the most congested area outside of London, a fact most of you have experience of. So with the growth of the super-port and logistics warehousing HGV, LGV and residential traffic will demand massive highway infrastructure improvements. The

Infrastructure Delivery Plan (IDP), however does not indicate how this is to be done, outside of the current ongoing improvements.

The current "improvements" to Windle Island (next door to the 8HS site) are intended to facilitate the smooth flow of traffic along the A580 between Liverpool and Manchester. These improvements are unrelated to Local Plan proposals.

Currently there is a proliferation of giant warehouses being built between Stonebridge Park, Knowsley and Florida Farm at Haydock driven by the the Northern Powerhouse initiative. These giant warehouses lie along along a 10 mile stretch of the A580 between the M57 and M6 motoways and are actively being marketed as having direct access to Liverpool and Manchester as well as to the national motorway network.

When the Port of Liverpool becomes fully operational we can expect an excess of 300% increase in HGV traffic on the A580.

2 Safeguarding land 8HS for the future development of 1000 houses with an estimated addition of 1800 cars seeking access to the A580 will cause an unacceptable impact on highway safety and the cumulative impacts on the road network would be severe.

The National Planning Policy Framework (NPPF) 2018 requires all plans to be sustainable and in the case of transport and infrastructure, para 109 states:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"

The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.

The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

7. Please set out modification(s) you consider are necessary

Develop the Infustructure Delivery Plan to explain the impact on Roads networks, Health Care and Education.

Adopt the ONS(2018) housing need statistics and remove all Green Belt reallocation from the Plan. This will remove site 8HS which will reduce the ever increasing demand on an already failing road network at Windle Island and the A580.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/7/2019 3:38:51 PM
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RO0447

Representor Details

Web Reference Number	WF0311
Type of Submission	Web submission
Full Name	Mr Keith Dawson
Organisation	
Address	44 Hawthorn Drive Eccleston St Helens WA10 5EF
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

St Helens is a post industrial town which has adequate Brownfield and Contaminated land which could easily meet the proposed housing need. The inclusion of Green Belt in the plan, which is mainly Grade 1 and 2 agricultural land, and then to "safeguard" this land for 15 years supports the fact that this Local Plan does not need to reallocate Green Belt. This Plan is not justified.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register. There will be more and more post industrial sites becoming available over the next 15 years as the town continues to lose investment- why does vast areas of greenbelt land such as HA16 have to be 'safeguarded' in the plan when the need for building here will be unnecessary given the amount of brownfield available both now and in the future.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites in the plan and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into

use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

7. Please set out modification(s) you consider are necessary

There is adequate brownfield land in St Helens to develop and meet the housing need. An update of the Brownfield register to include Brownfield and PDL that is not included is necessary to show no need for greenbelt release.

Include in the plan sites which are lowest priority contaminated land to be remediated should housing need not be met, removing the need for 'safeguarded' sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/7/2019 2:49:31 PM
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RO0448



St Helens Borough Local Plan 2020 - 2035 - Submission Draft.

The following comments are made in response to consultation on the St Helens Borough Local Plan 2020 - 2035 - Submission Draft on behalf of Cllr Joe De Asha Rainhill Ward Councillor in line with my residents/constituents concerns.

Policy LPAO6 : Safeguarded land proposes to safeguard site 3HS Eccleston Park Club, Rainhill Road, Eccleston for future housing development.

Whilst I appreciate that no development is proposed on the site prior to 2035 , should the site be considered for future development I wish to place on record that my concerns are the same as my constituents/residents that future development would:

1. Lead to additional traffic congestion on roads that are already at breaking point, especially with the major development not a mile away and the High School looking at expansion.
2. The additional traffic will make the whole area of Rainhill Road from the Golf Club site to the junction of Warrington Road dangerous for both pedestrians and vehicles alike.
3. All schools within the Village of Rainhill and the surrounding area are at capacity and this development (if allowed) would put more pressure on them as well as nursery provision.
4. The pressure on Doctors, Dentists and Hospital places will come under even more pressure if this location was ever allowed to be developed for housing.

5. We are told every day that the country is suffering from "Air Pollution", consequently this area of Ecclestone/Rainhill will come under such pollution if this location was ever allowed to be developed.

6. This community amenity will be lost forever if we allow it to be developed.

Unless all the above concerns are addressed I consider policy LPAO6 to be unsound as future development on this site would not adequately address the needs of the area and would not constitute sustainable development.

Cllr Joe De Asha

[REDACTED]

RO0449



St. Helens
Council

336

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

07 MAR 2019
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>ANDREW BRIAN</u>	First name: _____
Last Name: <u>DEAN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>3 THE CLOISTERS</u> <u>ECCLESTON ST HELENS</u>	Address: _____
Postcode: <u>WA10 5EJ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>28/2/19</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	8HS & 3HS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)		FORMALLY HAI6							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> NO. THE PLAN IS BASED ON FLAWED METHADOLGY
Effective?	<input checked="" type="checkbox"/> NO. THE PLAN IS NOT DELIVERABLE
Consistent with National Policy?	<input checked="" type="checkbox"/> NO. IT DOES NOT COMPLY WITH NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>THIS LAND IS "GREENBELT" LAND & SHOULD REMAIN SO. THERE IS ENOUGH BROWN BELT LAND WHICH SHOULD BE DEVELOPED FOR HOUSING IN STHELENS. THE SURROUNDING ROAD INFRASTRUCTURE CANT NOT SUPPORT AN ADDITIONAL 2000+ NEW PROPERTIES & NEITHER COULD THE LOCAL INFRASTRUCTURE OF SCHOOLS, DOCTORS, DENTISTS ETC RAIL STATIONS ETC. BUILDING NEW HOUSING ON THIS LAND IS NEITHER JUSTIFIED, EFFECTIVE OR CONSISTANT WITH NATIONAL POLICY. THE PLAN DOES NOT SATISFY THE CRITERIA FOR SUSTAINABLE TRANSPORT AS IT PROMOTES INCREASED CAR DEPENDENCY ON ALREADY VERY BUSY ROADS REMOTE FROM LOCAL TRASPORT HUBS.</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

WE BROWN BELT LAND NOT GREEN BELT LAND.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓

No, I do not wish to participate
at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0450

ELO326



{In Archive} St Helens Local Plan (LPSD - area 8HS
Barry Dearden
to:
planningpolicy
19/02/2019 22:45

Site 8HS
All - Policy LPA06

To the Chairman
St Helens Borough Council
Planning Policy Committee (LocalPlan)
Town Hall
Victoria Square
St Helens
WA10 1 HP
19 February 20119

Dear Sir or Madam ,

Reference the proposed plan for area 8HS which is the farm land south of the east Lancs road A 580 between Houghton's Lane and Crantock Grove near Windle Island Junction I would like to comment as follows

- A) As you are fully aware the so called improvements to what is commonly known as Windle Island at the junction of East Lancs Road and Rainford Road / Rainford By Pass Junction is highly unlikely to make much difference to the traffic flow unless there are somehow filter lights as the traffic as your highways know is currently fully stretched and the date was made public but I cannot remember the exact figure. The Florida Farm development is also going to pull much more traffic to and from the port of Liverpool / Bootle as this will be the easiest route via the Switch Island routing onto the motorway onto the east Lancashire road at Kirby intersection. The Alternative routing will be from Switch Island to the Motorway routing to Wigan but coming off at the Ormskirk end of the Rainford By Pass. ✓
- B) It is planned by west lancs area planning to build a New Industrial area and a large number of houses at the Ormskirk end of the Rainford By Pass were the Switch Island Bootle to Wigan Motorway junction is located which will also increase the Commercial and Domestic traffic flow resulting in increased traffic through Windle Island Junction. ✓
- C) Houghton's Lane is again a very narrow road with the stretch between what was the Carmelite and the East Lancs Road is very dangerous particularly at night due to the drainage ditch on the left when traveling towards the east lancs road from the Carmelite. This route is extensively used to either short cut to Liverpool or Rainford via the island just in the direction of Kirby. This is also used as a route to turn towards the direction of Manchester to go to ✓

LPA06

Rainford / Shemersdale / Wigan / Leigh / Billinge and the M6 Motorway.

- D) Increased traffic going from the Carmelite to in effect the Island at the end of Chapel lane Eccleston is already overloaded going to St Helens as you already know having constructed TWO islands to try to smooth out the traffic which is very ineffective at peak times particularly when Children Going and Coming home from School. ✓
- E) There is also the increased Public Bus Traffic in the morning for Children Travelling to and from Rainford High School through the Windle traffic lights and waiting to collect students in the morning at the top of bleak hill close to the Tesco / Rainford Road Junction.
- F) It is logic that if 1027 Houses are constructed in this area that on average looking at national statistics that there will be a minimum of 2 Motor Vehicles per Household and there will be probable 3 Children of School Age so I ask you to also consider were
 - 1) The additional traffic of 2520 cars are going to exit the area as there are basically access only via Houghton's Lane, Chapel Lane, East Lancs Road or up Bleak Hill and associated local connection roads
 - 2) These cars will have to fill with Fuel and on the basis of say 2/3 using the local services can Tesco at the Junction service this number of cars with the closing of some of the exits from there site as the junction across Rainford Road to Bleak Hill is very dangerous and without some form of traffic control this will be EXTREAMLY Dangerous.
 - 3) As it stands now even though we are supposed to have High Speed Internet this is not the case and at times it is very slow.
 - 4) The Schools you have recently confirmed from 2020 that Bleak Hill school will have another 90 places but where will the other children being about 3 per household gives a total of around 3780 Children of different ages to be educated as you would as St Helens Council education department theoretically place the balance of students 3690 be placed as Rainford High School cannot provide the places and even if the seniors can be partly accommodated by the different faith schools there is going to be a very large shortfall of places or parents will have to transport their children to Rainford Road or out to near Eccleston Mere but you I would suggest should discuss with the Education department of the Council how they can or intend to cope.
- G) There is Medical Services – where are the Doctors services as everybody I know in the Eccleston / Windle area all have to go to Doctors surgery's at places like the Low House LHRC Centre in Crab street or other locations in the Town Centre as there are no local surgery's in the area to my knowledge. Pharmacies it is necessary to go to the end of Knowsley Road or to Greenfield Road and for Non drivers this is a major problem as the Local Bus service is spasmodic.

H) For domestic shopping there is locally only Tesco at Windle Island, Texaco Service station (old Caldo service station on the east bound side of the East Lancs Road or in Warmesley Road or Coronation road or the next id Greenfield Road so not sufficient supply or choice resulting in increased traffic to St Helens via Dentons Green / Greenfield Road or Knowsley Road or traveling to Prescott. You already have problems with the town centre retail shop occupancy and with increased traffic coming into the centre from the outer areas you need to provide additional parking space.

I) Air Pollution with the already increased pollution from the traffic increase on the East Lancs Road traffic increase and this additional pollution from this increase of 1027 housing units I ask the question – HOW IS ST HELENS COUNCIL GOING TO MEET THERE STATUTORY REQUIRMENTS ON AIR POLLUTION as the residents will arrange to monitor this and take appropriate legal action if necessary.

J) Where are you going to provide the facilities for Sewage / waste water, fresh drinking water, electric and gas services as from memory the major water Supply line which comes from Eccleston Lane Ends across this area as it continues towards Ashton in Makerfield.

I think and recommend that you should very carefully consider these points before you state you will safeguard this land as it should maybe have very limited development but not to the level stated in your policy and should NOT BE REMOVED FROM THE GREEN BELT

Best Regards
David M B Dearden
6 Moss Lane
Windle
St Helens
WA11 7QD

RO0451

① - LPA06 ② - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0475
Type of Submission	Web submission
Full Name	Dr Hannah Denno
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Green belt land in Windle
Paragraph / diagram / table	Site 8HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I believe the estimated housing need is too high, and that the figures are based on incorrect assumptions, there are therefore no exceptional circumstances to justify use of Green Belt Land. Other local options have not been sufficiently explored such as the use of previously developed land nearer the town centre. This land needs to be reclaimed and used for housing this would enhance the appearance of the town centre in a more sustainable way that did not need new infrastructure. This is an area with ecologically diverse habitats which is used for recreation and leisure. The Council have failed to co-operate with other councils and have not published any statement(s) of common ground.

7. Please set out modification(s) you consider are necessary

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/18/2019 6:23:27 PM
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RO0452

①-LPA06 ②-LPA04

Representor Details

Web Reference Number	WF0172
Type of Submission	Web submission
Full Name	Mr Michael Dennett
Organisation	
Address	17 Sandfield Road Eccleston St Helens WA10 5LR
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is a disgrace to be giving up greenbelt land for housing when there is so much brownfield land available within the town. Past sites such as The Shires had to be cleared and treated to build on and this could be done again with numerous plots around the borough. Knowsley council did this with the old BICC site so it can and should be done first.

The roads around proposed site 8HS are already gridlocked at rush hour and the works at Windle Island have turned Eccleston roads into a rat run, an extra 1000+ cars a day cannot be sustained. It takes weeks to get a Doctors or Dentist appointment and the local schools are at bursting point with the projected admittance of children who already live here nevermind an extra 1500 families. St Helens council are using old statistics to try and pull the wool over peoples eyes about how many house are actually needed, they are using stats from the ONS(2014) stating 486 a year will be needed to meet housing needs when a more up to date report from 2016 states that it's actually 383 needed!!

The greenbelt should be saved for future generations to enjoy and not have a town that was once green to look at and just be left with 1000's of hectares of post industrial mess to enjoy!!

The loss of grade 1 and 2 agricultural land which has been farmed for over 100 years is a joke when we don't know what is going to happen with Brexit.

The land 8HS south of A580 is used by the community to walk and exercise in and around.

①

It makes me laugh how on one hand in the councils propaganda magazine St helens first, they are talkin about "The year of environment" with a councillor quottng "The council is fully committed to this initiative which is a great opportunity for members of the public to get out in our beautiful parks and OPEN SPACES..." and then on the other hand trying to take it away.

The plan is not effective and is just a back door to building in high council tax areas.

They are living in a dream world with completely made up assumptions about jobs being created and the house they will build in the greenbelt will not alleviate the so called housing crisis as the jobs provide in warehousing are minimum wage roles.

7. Please set out modification(s) you consider are necessary

All green belt land should be retained for future generations.

Re-develop brownfield and PDL sites- it can and should be done and there is plenty of evidence in the surrounding areas- Southport developing an old landfill site.

If brownfield sites are not developed we will be left with derelect old industrial sites, whilst the beautiful green belt has gone for greedy house builders and the council letting this happen in the HIGHER COUNCIL TAX BANDS!!

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 5:50:31 PM
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RO0453

Representor Details

Web Reference Number	WF0307
Type of Submission	Web submission
Full Name	Mr Kevin Dennett
Organisation	
Address	32 Crocketts Walk Eccleston St Helens WA10 5DU
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

8HS is not a sustainable parcel of land on which to build over 1000 houses. It is adjacent to the A580 which is a thoroughfare for traffic from Liverpool Super port to the M6. This area is noisy and polluted.

The roads adjacent on the village side are narrow and cannot accommodate the extra cars that these 1000 houses will generate. Pedestrian safety has not been considered.

8HS is currently a mixture of Grade 1 and 2 agricultural land which is currently being farmed providing food security for the increased population. It should remain in Green Belt.

The safeguarding provision in the St. Helens Local Plan Submission Draft is excessive and it is not necessary for 8HS to be classed as safeguarded to meet housing needs beyond 2035. There is no mention of previously developed town centre and low-level contaminated sites being brought back into use. It cannot be sound policy to sacrifice Green Belt and productive Farmland whilst leaving town centre sites to further decay and decline.

The site has a brook (Windle Brook) running through it. This lies on a flood plain and any development would need to take this into consideration.

The local Primary and Secondary schools are oversubscribed. New schools will be required and there is nowhere to build them.

① 8HS is not well serviced by public transport. The train stations are in town, over 4 miles away. The current buses do not connect Ecclestone and Windle with employment areas. The Local Plan Submission Draft is based on flawed employment forecasts and cannot be supported by historical facts.

7. Please set out modification(s) you consider are necessary

8HS should be changed from the safeguarding for development category and maintained as Green Belt for the reasons above.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/7/2019 4:07:36 PM
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RO0454

Representor Details

Web Reference Number	WF0308
Type of Submission	Web submission
Full Name	Mrs Michelle Dennett
Organisation	
Address	32 Crocketts Walk Eccleston St Helens WA10 5DU
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

① St Helens has adequate Brownfield and Contaminated land which could easily meet the proposed housing need. The inclusion of Green Belt, which is mainly Grade 1 and 2 agricultural land, and then to "safeguard" this land for 15 years supports the fact that this Local Plan does not need to reallocate Green Belt. This Plan is not justified. ②

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 49 ha and 53 ha (contributing to an overall total of 143ha) are being reclassified as safeguarded land sites in the plan and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The Infrastructure Delivery Plan is weak. In the areas suggested for housing development there are already schools shortages and major transport problems. In particular, 8HS sits beside the main arterial route from Liverpool to Manchester(A580) and will cause further traffic problems as well as removing the green lung that currently protects the locality from the pollution caused by this road. The Plan is not effective.

The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016)

Residential vehicle ownership in St Helens will grow significantly with this plan. As most of the City Regional and adjoining authorities are adopting a similar growth strategy this will be mirrored across the whole of the North West.

The Northwest has recently been identified as the most congested area outside of London, a fact most of you have experience of. So with the growth of the super-port and logistics warehousing HGV, LGV and residential traffic will demand massive highway infrastructure improvements. The Infrastructure Delivery Plan (IDP), however does not indicate how this is to be done, outside of the current ongoing improvements.

The current "improvements" to Windle Island (next door to the 8HS site) are intended to facilitate the smooth flow of traffic along the East Lancs Road between Liverpool and Manchester. These improvements are unrelated to Local Plan proposals.

Currently there is a proliferation of giant warehouses being built between Stonebridge Park, Knowsley and Florida Farm at Haydock driven by the Northern Powerhouse initiative. These giant warehouses lie along a 10 mile stretch of the A580 between the M57 and M6 motoways and are actively being marketed as having direct access to Liverpool and Manchester as well as to the national motorway network.

When the Port of Liverpool becomes fully operational we can expect an excess of 300% increase in HGV traffic.

Safeguarding land 8HS for the future development of 1000 houses with an estimated addition of 1800 cars seeking access to the A580 will cause an unacceptable impact on highway safety and the cumulative impacts on the road network would be severe.

The National Planning Policy Framework (NPPF) 2018 requires all plans to be sustainable and in the case of transport and infrastructure, para 109 states:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"

The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.

The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities.

Predetermined employment growth is based on unreasonable assumptions and a very small evidence base. There is nothing to underpin these aspirational figures. This results in an over supply of housing. The figures quoted in the plan should be replaced by the ONS (2018) which uses more current data. St Helens Council have stated in public arenas and the local press that house building is needed to provide Council Tax income. The use of old data is to justify this stance. Hence the plan is not positively prepared.

St. Helens has relatively high unemployment rate compared to the other Local Authorities in the North West, with a 7.1% rate. There is no mention of policies to try and reduce unemployment rates to boost jobs for residents living within St. Helen. A 1%age point reduction, for example, would reduce the numbers of new dwelling needed by some 50 dpa.

Even without any change in jobs over the projection period, the population change (due to ageing) is driving a large increase of the housing growth, a point acknowledged in Section 6.3.5 of the Local Plan Update . Assuming the ONS SNPPs are in the right ball park for the 75+ age group and bearing in mind that only small numbers of the 75+ age group move, then 367 of the total housing growth comes from the 75+ age group (from the 2014 SNHPs). That would leave $486 - 367 = 119$ dwellings for new jobs.

However, in order to accommodate 7,797 new jobs (Table 9, SHMA Update - Scenario 2 - Option 3) it would require a huge boost to the working age population. In rough terms, an extra 11,900 16-74 population (assuming 67% Economic Activity Rate and no change to unemployment rates or commuting rates) which translate to around 16,000 people (the 16-74s make up 70% of the total population) or an extra 940 people per annum (All ages). If you feed an extra 940 people each year into the population and household projections, this generates a household population of 930 (less Institutional Population of 1.1% as at 2033 - 2014 SNHPs) divided by the average household size (AHS) in 2033 (2.17, 2014 SNHPs) and vacancy rate of 3% gives 440 dwellings pa to add to the 367 for the 75+ which gives 807 dpa.

The numbers of dwellings (and population) arising from the extra 7,797 jobs would be well above what is projected due to the age structure of St. Helens where the 75+ age group accounts for 71% of the increase. There is a clear disjoint in the relationship between jobs, dwellings and population.

7. Please set out modification(s) you consider are necessary

The points raised throughout the Green Belt Review (2018) clearly show inconsistencies with subjective scoring and findings. It's almost as if some of the parcels of land have been pre-selected for safeguarding or discounting and then the scoring, findings and rationale documented to produce the desired results.

There are no exceptional circumstances to justify not using the standard method for Housing need. The economic analysis is flawed and based on over-optimistic assumptions, the level of land needed is therefore not as high as set out in the Local Plan, therefore there are no exceptional circumstances to change Green belt boundaries.

Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land.

These alternatives will have less impact on the environment and lead to less need for new infrastructure.

The Council have failed to cop-operate with other councils and have not published any statement(s) of common ground.

For these reasons and unless the plan is significantly modified it will fail both the legal tests it has to pass and the tests of soundness

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

RO0455

Representor Details

Web Reference Number	WF0441
Type of Submission	Web submission
Full Name	Mrs. SHEILA DEVENISH
Organisation	LOCAL RESIDENT
Address	40 CALDERHURST DRIVE WINDLE ST. HELENS WA10 6ED
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

No

3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	8HS
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan is UNSOUND .for the following reasons:

1. It is based upon flawed information and aspirational housing needs. The Councils's predicted housing need was based upon a forecast made in 2014 for a minimum of 486 houses per year. The ONS prediction now (in 2016) is for a need for 383 houses per year.
2. It is not deliverable. The access for the additional vehicles associated with a capacity for 1027 dwellings cannot be accommodated by the existing roads, particularly Houghtons Lane, Lynton Way, Calderhurst Drive and the A580.
3. It does not comply with NPPF2018 because the adverse effect on traffic growth and the Community Infrastructure would be unsustainable.

7. Please set out modification(s) you consider are necessary

Abandon the "safeguarded" status of the area and revert to the protected status of Green Belt.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/25/2019 4:49:13 PM
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RO0456

Representor Details

Web Reference Number	WF0442
Type of Submission	Web submission
Full Name	Mr. Michael Devenish
Organisation	Local Resident
Address	40 Calderhurst Drive Windle St. Helens WA10 6ED
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	8HS
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Local Plan in respect of Area 8HS is UNSOUND for the following reasons:

1. It is based upon flawed methodology and aspirational housing needs. The predicted need for 486 houses per year was based upon a forecast made in 2014; the latest (2016) ONS prediction is for 383 houses per year.
2. It is not DELIVERABLE. The access for the additional vehicles associated with a capacity for 1027 dwellings could not be accommodated by the existing infrastructure, particularly Houghtons Lane, Calderhurst Drive and the A580.
3. It does not comply with NPPF2018 because the effect on traffic growth and the Community Infrastructure would be unsustainable.

7. Please set out modification(s) you consider are necessary

Leave area 8HS as part of the Green Belt - not "Safeguarded for Future Development".

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/25/2019 3:38:19 PM
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RO0457



St Helens local plan
Gill Dickinson
to:
'planningpolicy@sthelens.gov.uk'
12/03/2019 21:07

EL0130
① LPA04

To whom it may concern

① I wish to object in the strongest possible terms to the local plan which will remove tracts of land from the Green Belt in the area of Parkside and beyond. Brown field land should be used in preference. There are no special circumstances that warrant this removal as the rail terminal has not been specifically sited in the plan. No reference has been made to surrounding villages in adjacent local authorities who will bear the brunt of congestion and increased air pollution in an area already of very poor air quality.

Regards
John Dickinson
9 Winwick Lane
Lowton
Warrington
WA3 1LR

RO0458



Fwd: St Helens local plan
John and Gill Dickinson
to:
planningpolicy
12/03/2019 21:11

EL0131

① LPA04

① [

I wish to object to the St Helens local plan which will remove tracts of land from the Green Belt in the area of Parkside and beyond.

Regards
Gill Dickinson
9 Winwick Lane
Lowton
Warrington
WA3 1LR

RO0459

Representor Details

Web Reference Number	WF0393
Type of Submission	Web submission
Full Name	Mrs Hilary Dilworth
Organisation	
Address	90 Higher Lane Rainford St. Helens WA11 8AL
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	Greenbelt / New housing in Rainford
Paragraph / diagram / table	
Policies Map	site ref 8AH
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Justified

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The proposal to build 259 new houses on Greenbelt land is unjustified. The area in question is grade A agricultural land. Greenbelt land should only be release in exceptional circumstances. Once this is handed over to developers it can never be used for food production again. The Greenbelt around St Helens also provides a 'green lung' to a town with significant health problems.

Greenbelt land needs to be protected while there are alternative Brownfield sites available in the Borough.

This particular development is also unsound as no extra schools or medical facilities have been proposed. Extra traffic in this area would be chaotic.

I am also concerned about the proposed development potentially contributing to the risk of flooding along Rainford Brook. There is a need to slow the flow of rural headwaters, not make matters worse. Safeguarding countryside from encroachment should be paramount while assisting urban regeneration should be done by recycling derelict land.

7. Please set out modification(s) you consider are necessary

New housing and industrial development should take place on regenerated Brownfield sites in the Borough. There are sufficient such areas and they should be used first. The council's own register shows there is enough brownfield land in St Helens for 5,818 houses.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/2/2019 3:18:49 PM
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RO0460



St. Helens
Council

① - LPA05 ② - Statement of Common Ground
③ - LPA06 ④ - Statement of Common Ground

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

24 APR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: SUE	First name:
Last Name: DINSMORE	Last Name:
Organisation/company:	Organisation/company:
Address: 2 ULLSWATER AVE ASHTON-IN-MARKFIELD	Address:
Postcode: WY4 8 AS	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: 3.4.19.
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St. Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St. Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at www.sthelens.gov.uk/localplan. If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

The Council intends to submit the St. Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at www.sthelens.gov.uk/localplan.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy PA05		Paragraph / diagram / table		Policies Map	14A	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Garswood Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. [REDACTED]

[REDACTED] There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1HA. This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and [REDACTED]
[REDACTED]

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
LP A06				1 HS					
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

causing an obstruction to all road users, this is due to local people living on the estate taking their children to school. Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. I have lived in Garswood/Simms Lane End for seventy years. There were coal pits in Garswood in the past, there were four pits. One on the land off Billinge Road, from Simms Lane up to Billinge, one on Arch Lane, two on Garswood Road/Winstanley Road and an open cast on Garswood Road/Winstanley Road. There are mines under the fields especially under 1H5 This will need to be factored in to the cost of building the estate.

N.B. The number of children with asthma is increasing due to pollution and

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please continue on a separate sheet if necessary

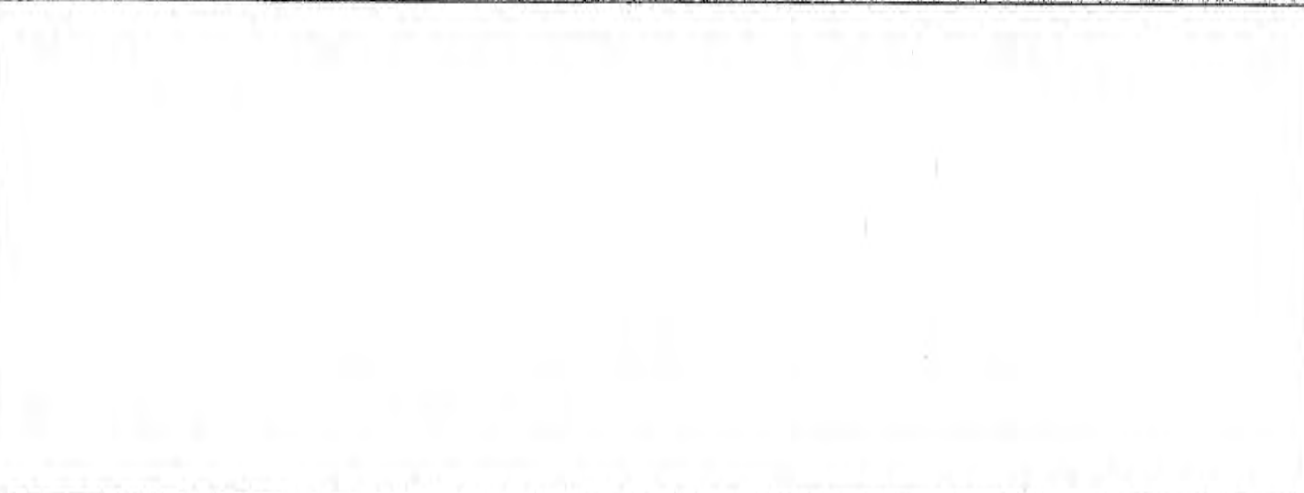
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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

X	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.



Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

RO0461

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019.**

Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

- ① LPA02
- ② LPA04
- ③ GENERAL
- ④ IDP
- ⑤ LPA08

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>EUGEN</u>	First name: _____
Last Name: <u>DODD</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>24 NICOLL ROAD</u>	Address: _____
<u>ECCELESTON</u>	_____
<u>ST HELENS LANCES WA10 5LW</u>	_____
Postcode: _____	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>12.3.2019</u>
------------------	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
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St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

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Telephone: **01744 676190**

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**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes ?	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.	
<p>DOES NOT COMPLY WITH NPPF (2018) GUIDELINES</p> <p>DOES NOT EXPLAIN HOW THE ROAD INFRASTRUCTURE PROBLEMS WILL BE OVERCOME</p> <p>ALL FORECASTS ARE HIGHLY ASPIRATIONAL AND NOT EVIDENCED BY HARD FACTS —</p> <p>SEE ATTACHED SHEET FOR MORE DETAILS</p>	

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

CLARIFICATION IS NEEDED ON THE NPPF METHOD OF CALCULATING HOUSING NUMBERS (2016 OR 2018) UNTIL THIS HIGHLY ASPIRATIONAL^{METHOD} IS MODIFIED ON A REGIONAL AND NOT NATIONAL BASIS - NO FURTHER PROGRESS SHOULD BE MADE.

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
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Dear Sirs

This continuation sheet is further to my Representation/Comment form.

I believe that this Submission Draft does not satisfy the requirement for sustainable development because the plan promotes increased car dependency, the housing targets are based upon outdated NPPF guidelines, are extremely aspirational, and ignores the requirement to preserve food security by ignoring Agricultural Land Quality and the demand for green spaces as a community requirement. ①

Employment Land: I am dismayed at the number of giant warehouses springing up along the A580, each needing HGVs to supply stock for disbursement and HGVs and LGVs to distribute to final destinations. I fear that many of these sites will fail to reach their planned potential, leaving a legacy of derelict sheds and wasted unoccupied land. ②

Brownfield sites: St Helens Council states that the cost of cleaning up the Brownfield sites of St Helens would cost £40 million. Monies were available via the Liverpool City Council for this purpose. I have not seen any report of the Council's effort to bid for these monies, successful or not. ③

Traffic Issues and Duty to Cooperate: St Helens MBC is a member of the Liverpool City Partnership and as such is privy to the planning issues being passed as the programme for the Northern Powerhouse is rolled out but continues to push ahead to please the developers, ignoring the views of the local residents. There is no obvious cooperation to provide an integrated transport plan between St Helens, Knowsley, Wigan or Warrington. Any employees would need to travel by private car to the new business estates, mainly along the A580 as there is no existing public transport nor any published plans for the future. The impending effects of the Superport at Bootle expansion means that there will be an explosion of HGV traffic to service the burgeoning warehousing between the M57 and the M6. ①

Already these units are advertising **DIRECT** access for HGVs to Liverpool and Manchester by using the A580 and passing Windle Island in both directions and the Council's plan to build 1027 new homes on 8HS states that there will be an access road onto the A580 by rerouting Houghtons Lane. This area has seen 3 fatalities recently and an estimated 1800 extra cars at peak times is not sustainable. ✓

Windle Island: The Local Infrastructure Delivery Plan (IDP) also states that there will be access to the Junction of Bleak Hill road and Rainford Road. Given that the new "improvements" to Windle Island include a forced exit from Tesco garage/Costa coffee onto Rainford road for traffic turning northwards along the A570 (Rainford bypass). In the opinion of the local residents this is sheer stupidity and will lead to even more complications at this junction. As part of the Northern Powerhouse initiative, it is proposed to build 6000 houses 5 miles to the north of St Helens. These dwellings are contiguous to the A570 Rainford bypass and although they straddle the M58 motorway it is obvious that there will be peak time pressures on Windle Island as commuters seek access to west Manchester and east Liverpool. ④

? WEST
LANCS LP?

This plan promotes unsustainable traffic growth that will not satisfy the NPPF (2018) guidelines (para109) – **“Development should only be prevented or refused if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”**

①

This is echoed in the Council's own proposed submission draft (LP01 sec 4.25) which includes the following:

“3. New development will only be permitted if it would: a) maintain the safe and efficient flow of traffic on the surrounding highway network. Development proposals will not be permitted where vehicle movements would cause severe harm to the highway network b) be located and designed to enable a suitable level of access (having regard to the scale and nature of the proposal) to existing and / or proposed public transport services.”

To propose a housing development in the face of these obstacles shows a clear disregard for NPPF guidelines regarding the plan being positively prepared and it is clearly not sustainable without a major revision of highways infrastructure.

①

Community Infrastructure: Currently this area has a much reduced and inadequate bus service with a new health centre built nearly a mile away and not accessible by bus. Older residents and non drivers are forced to use taxis to access this amenity or to visit local supermarkets. Because of these difficulties, many non drivers and disabled residents have to shop online, thus bringing more delivery vans into the existing local area. The idea of building a further 1100 houses is totally unsustainable.

⑤

I feel that a suitable alternative to this plan would be to maintain the farming activity, thus protecting our food supply (especially in the face of Brexit uncertainty), Plant wildflower corridors within the crops and deciduous trees around the perimeter of this land , providing a carbon sink to offset the effects of the increased pollution that the extra traffic will bring.

SUGGEST
MOSS!

Taking into account all these reasons, I feel that the Latest Plan Submission should be rejected on the grounds that it cannot accommodate more houses with the present infrastructure and the land should be better used for environmental protection.

Yours sincerely

Mrs E Dodd

24 Nicoll Rd, Eccleston St Helens

RO0462

12 MAR 2019

Ref: LPSD

(For official use only)



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Part B - Your Representation(s)

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Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>MARY</u>	First name:
Last Name: <u>DODGSON</u>	Last Name:
Organisation/company:	Organisation/company:
[Redacted]	Address:
[Redacted]	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: <u>[Redacted]</u>	Date: <u>5/3/19</u>
------------------------------	---------------------

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3. To which part of the Local Plan does this representation relate?									
Policy	LPA 05 SITE 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	DONT KNOW	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sound?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	

NOT JUSTIFIED ST. HELENS POPULATION HAS DECLINED SO WHO DO YOU PROPOSE TO HOUSE HERE? BY BUILDING ON GREENBELT ST. HELENS WILL HAVE NO GREENBELT FOR PRESERVATION OF WILDLIFE ETC NOT ENOUGH INFRASTRUCTURE PUT IN PLACE I.E. SCHOOLS DOCTORS SURGERY'S, HOSPITALS, BUSES WHICH LEADS TO RESIDENTS USING CARS. ACCESS TO PROPOSED SITE (HOUSES) WILL PUT ADDED PRESSURE ONTO AN ALREADY HEAVY CONGESTED ROADS. AS MANY A DAY THIS AREA IS TOTALLY GRIDLOCKED. WHICH ALSO ADDS TO POLLUTION WHICH THEN WOULD LEAD TO HEALTH PROBLEMS FOR RESIDENTS

Please continue on a separate sheet if necessary

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ST. HELENS TO PROVIDE EVIDENCE THAT THE PROPOSAL IS NECESSARY AND TO OUTLINE BENEFITS OF PROPOSAL. TO ENSURE ALL CALCULATIONS ARE CORRECT FOR THIS PROPOSAL + TO ENSURE IT WILL BENEFIT WILDLIFE, RESIDENTS, ROADS AND SUSTAINABILITY OF THE COMMUNITY.

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

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--

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Please keep a copy for future reference.

LPA 05 SITE 2HA MARY DODGSON
LPA 04 SITES 2EA, 5EA + 6EA

BY THE PROPOSALS TO BUILD A FURTHER
522 HOUSES IN MAYDOCK THIS CAN AND
WILL CAUSE FURTHER FLOODING ON AN
OVERSTRETCHED FLOOD ~~PLAIN~~ PLAIN
BECAUSE BLACKBROOK/MAYDOCK IS ALREADY
CLASSIFIED AS A LEVEL 3 FLOOD RISK.
RESIDENTS ARE ALSO PAYING LARGE PREMIUMS
FOR HOUSE CONTENTS INSURANCE BECAUSE OF
THE KNOWN FLOOD RISK ALREADY IN PLACE

WE ARE COMING TO BREXIT WITH WORRIES
OF IMPORTED PRODUCE SO WITHOUT
GREEN BELT LAND WE WILL NOT BE ABLE
TO GROW OUR OWN CROPS AS THIS WOULD PROVE
IMPOSSIBLE.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA 04 SITES 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No DONT KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>ST. HELENS COUNCIL HAVE NO JUSTIFICATION FOR THIS SITE REGARDING THE SCALE, THE POSITION OF SITE CLOSE TO RESIDENTIAL AREA DEVALUATION OF RESIDENTS PROPERTIES, NOISE AND TRAFFIC POLLUTION. REDUCTION IN GREENBELT LAND, WHAT WAS A RESIDENTIAL AREA IS FAST BECOMING AN INDUSTRIAL SITE. THIS SITE WILL ALSO ADD TO THE PROBLEMS OF FLOODING, CLIPSLEY BROOK + EAST LANCS ROAD.</p>	

2

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THESE WAREHOUSES SHOULD BE BUILT AWAY FROM RESIDENTIAL AREAS TO ENABLE THE GROWTH OF GREENBELT LAND. ALSO TO REDUCE TRAFFIC CONGESTION NOISE AND POLLUTION TO RESIDENTS. NO HEALTH OR WELLBEING TO RESIDENTS BEEN TAKEN INTO CONSIDERATION.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

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--

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RO0463



St. Helens
Council

717

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

13 MAR 2019

(For official use only)

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Part B – Your Representation(s).

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Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: ELIZABETH	First name:
Last Name: DODSON	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 44 LAKE SIDE GARDENS RAINFORD	Address:
Postcode: WA11 8HH	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

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Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy <u>All</u>		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				S HA LAND SOUTH OF Higher Lane AND EAST OF Rookery Lane, RAINFORD					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

My comments ARE AS Follows:

- Building 259 houses on Rookery lane poses A Risk to wildlife preservation, A substantial loss of Agricultural land - This will be crucial for future generations especially in the wake of Brexit.
- Lack of infrastructure e.g. health facilities, Education, (schools) leisure facilities, Flooding risk to other Areas.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I would suggest NOT building on site 8 HA which is prime Agricultural land.
Building warehouses outside of Rainford will NOT produce A SUBSTANTIAL number of jobs.
Therefore The Council need to consider Alternative Policies.

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination ✓

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

RO0464



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

- 1 MAR 2018

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

01 MAR 2019

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: STEPHEN	First name:
Last Name: DOHERTY	Last Name:
Organisation/company:	Organisation/company:
Address: 440 GARSWOOD ROAD ASHTON IN MAKERFIELD WIGAN	Address:
Postcode: WN4 0XJ	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [Redacted]	Date: 28.02.2019
-----------------------	------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy LPA06	Paragraph / diagram / table LPSD IHS		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments	
<p>Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, Doctor's surgeries, bus routes, parking at the train</p>	

Station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground. N.B. The number of children with asthma is increasing due to pollution and there are a significant amount of children in Garswood with asthma. A child has died due to pollution and that is one child too many.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

☒ **No, I do not wish to participate at the oral examination**

Yes, I wish to participate at the oral examination

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St Helens
Council

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Ref: LPSD

- 1 MAR 2018

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01 MAR 2019

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: STEPHEN	First name:
Last Name: DOHERTY	Last Name:
Organisation/company:	Organisation/company:
Address: 440 GARSWOOD ROAD ASHTON IN MAKERFIELD WIGAN	Address:
Postcode: WN4 0XJ	Postcode:
Tel No:	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: 28.02.2019
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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St. Helens
Merseyside
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

NEXT STEPS

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	LPSD LPA051HA	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

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Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="checked" type="checkbox"/>	No , I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes , I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

RO0465

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

30 APR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:
www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

902

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>JEANETTE</u>	First name: _____
Last Name: <u>DOLAN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>12 Douglas Ave</u> <u>Bold</u> <u>St. Helens</u>	Address: _____
Postcode: <u>WA94SZ</u>	Postcode: _____
Tel No: <u>[REDACTED]</u>	Tel No: _____
Mobile No: <u>[REDACTED]</u>	Mobile No: _____
Email: <u>[REDACTED]</u>	Email: _____

Signature: <u>[REDACTED]</u>	Date: <u>12/4/19</u>
------------------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

RO0466

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

30 APR 2019

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

903

1. Your Details

(we will correspond via your agent)

Title: MISS

First Name: Bethany

Last Name: Dolan

Organisation/company: _____

Address: 12 Douglas Ave

Bold

St helens

Postcode: WA9 4SZ

Tel No: _____

Mobile No: _____

Email: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

mail: _____

Signature: _____

Date: 17/04/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

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planningpolicy@sthelens.gov.uk

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RO0467



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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30 APR 2019

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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

904

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>DAVID</u>	First name: _____
Last Name: <u>DOUGLAS</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>12 DOUGLAS AVENUE</u>	Address: _____
<u>BOLD</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA9 4SZ</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>17-4-19</u>
------------------	----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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post to:

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Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

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planningpolicy@sthelens.gov.uk

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**Now please complete PART B of this form,
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**Please use a separate copy of Part B
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RO0468



St.Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD
30 APR 2019

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

905

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: NEIL

Last Name: DOLAN

Organisation/company: _____

Address: 12 DOUGLAS AVE

BOLD

ST HELENS

Postcode: WA9 4SZ

Tel No: _____

Mobile No: _____

Email: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____ Date: 17/4/19

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☐ No

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RO0469



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>LINDA</u>	First name:
Last Name: <u>DOLAN</u>	Last Name:
Organisation/company: <u>/</u>	Organisation/company:
Address: <u>14 ORCHID WAY ST HELENS</u>	Address:
Postcode: <u>WA9 4ZN</u>	Postcode:
Tel No: <u>[REDACTED]</u>	Tel No:
Mobile No: <u>/</u>	Mobile No:
Email: <u>[REDACTED]</u>	Email:

Signature: <u>[REDACTED]</u>	Date: <u>24/4/19</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:

post to: **Local Plan
St.Helens Council
Town Hall
Victoria Square
St.Helens
Merseyside
WA10 1HP**

or by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

or by e-mail to: **planningpolicy@sthelens.gov.uk**

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website at **www.sthelens.gov.uk/localplan**. If you still need assistance, you can contact us via:

Email: **planningpolicy@sthelens.gov.uk**
Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at **www.sthelens.gov.uk/localplan**.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

RO0470



St. Helens
Council

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PART A – YOUR DETAILS

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1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>JAMES</u>	First name:
Last Name: <u>DOLAN</u>	Last Name:
Organisation/company: <u>/</u>	Organisation/company:
Address: <u>14 ORCHID WAY</u> <u>ST HELENS</u>	Address:
Postcode: <u>WA9 4ZN</u>	Postcode:
Tel No: <u>[REDACTED]</u>	Tel No:
Mobile No: <u>[REDACTED]</u>	Mobile No:
Email: <u>[REDACTED]</u>	Email:

Signature: <u>[REDACTED]</u>	Date: <u>24/4/19</u>
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Yes ☒ (Via Email)

No ☐

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WA10 1HP**

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RO0471



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
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Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1312

13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: GILLIAN	First name:
Last Name: DOLAN	Last Name:
Organisation/company:	Organisation/company:
Address: 78 Broadway St Helens	Address:
Postcode: WA10 5DH	Postcode:
Tel No: -	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED]	Date: 22.4.19
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Yes ☐ (Via Email)

No ☒

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

RO0472

Representor Details

Web Reference Number	WF0450
Type of Submission	Web submission
Full Name	Mrs Alice Donnellan
Organisation	Private householder
Address	23 Oak Tree Road Eccleston St. Helens Merseyside WA10 5LJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared. 01

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective. 02

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

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Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites. NB I submitted this form on 22nd Feb, but did not receive an automated reply so have re-submitted, in case the first one was not received.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/23/2019 9:59:21 AM
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① - LPA05 ② LPA06, 8HS ③ - GEN ④ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0462
Type of Submission	Web submission
Full Name	Mrs Alice Donnellan
Organisation	Private Householder
Address	23 Oak Tree Road Eccleston St. Helens Merseyside WA10 5LJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

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Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

②

①

③

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③

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④

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No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/22/2019 9:08:16 AM
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RO0473

①-LPA05 ②-LPA06, 8HS ③-GEN ④-Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0451
Type of Submission	Web submission
Full Name	Miss Mary Donnellan
Organisation	Private Householder
Address	23 Oak Tree Road Eccleston St Helens Merseyside WA10 5LJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

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Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

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Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

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NB: I submitted the above form on 22nd Feb 2019, but I did not receive an acknowledgement, so I have re-submitted today, in case the one from 22nd was not received.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	2/23/2019 9:52:37 AM
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① - LPA05 ② - LPA06, 8HS ③ - GEN ④ - Para 1.7.2 DTC

Representor Details

Web Reference Number	WF0463
Type of Submission	Web submission
Full Name	Miss Mary Donnellan
Organisation	Private Householder
Address	23 Oak Tree Road Eccleston ST. HELENS Merseyside WA10 5LJ
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt review 2018

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

The Green Belt Review (2018) contains questionable decisions, based on comments from developers rather than the opinion of local people and facts. In particular, land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need. The Plan is not effective.

②

①

③

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made. ④

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so. ①

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land. ③

The Plan is not effective.

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date

2/22/2019 8:48:05 AM

RO0474



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS.

First Name: CHRISTINE

Last Name: DONNELLY

Organisation/company: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 7.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

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planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Where are all these extra cars on our already crowded roads going to go, it's already chaos, especially at school time. St. Helens isn't the town it once was, it is no longer thriving, we don't need all these extra homes. Look at the chaos at the Millfields development, a lovely community spoiled and an accident waiting to happen. If Brexit goes as expected we will need our agricultural land more than ever.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

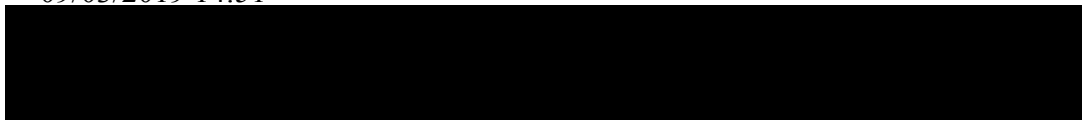
Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0476



Response to the Local Plan for the Inspector
Sue Dow
to:
planningpolicy@sthelens.gov.uk
09/03/2019 14:51



We would like to register our objections to St Helens Local Plan to remove land from the greenbelt. (8HA Rockery Lane)

We are disturbed about any land being removed from the greenbelt but especially Grade 1 Agricultural Land and land that is actively farmed and provides employment. The St Helens Local Plan is intended to promote employment and economic growth but this will have the opposite effect. Also there has been no consultation with Natural England over the loss of Grade 1 Agricultural land. We need fields to grow crops to feed the people who live here instead of importing so much from Europe and further afield. Not only do we need this land now but we need it in the future, especially as nationally our population is growing. Once greenbelt has been removed it can never be returned. The greenbelt was designed to prevent urban sprawl and over development which so far has worked well but the Local Plan would be detrimental to this.

Greenbelt is also good for the health of residents who can walk along the footpaths enjoying the benefits of being in the fresh air and amongst the fields. This also good for the mental health of the population. St Helens is an area with significant health problems, including heart and lung disease as well as high childhood and adult obesity rates. Diabetes is a huge problem for the UK and as Rainford has few facilities we need our greenbelt.

The Government says Greenbelt land should only be released in exceptional circumstances and there are no exceptional circumstances to change the greenbelt boundaries. St Helens Council has enough brownfield sites to use and these brownfield sites should be used to build homes on and to tidy up the often unsightly areas these sites have become. The Council wants to build 486 houses every year but figures from the Office for National Statistics show St Helens only needs 383 houses per year. If these most recent figures from the ONS are used, the amount of building could be significantly reduced. Other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land. These alternatives will have less impact on the environment and lead to less need for new infrastructure.

The Council have failed to co-operate with other councils and have not published any statement of common ground.

The Council's brownfield site register reveals there is enough land for 5,818 houses. The Borough has a falling population and very low property prices and the demand for these properties is low. Building on greenbelt land is not appropriate!

The greenbelt land is a much desired commodity for the developers as it is easy and cheaper to build on than land that needs cleaning up and these are the reasons that the developers push the Council to release it from the greenbelt. These houses are much easier to sell but the prices would be much higher and of course not many homes would be affordable. The property companies are the only winners as their profits are much larger. There would be extra traffic on the roads as each house would probably have two cars and village roads are not built for large volumes of traffic and public transport, both train and bus, is poor.

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and test of soundness.

I would urge you to refuse this Local Plan and insist St Helens Council acts responsibly and uses brownfield land to build on which is readily available and where transport and amenities are more abundant. I hope you encourage the Council to leave the fields for crop growing in order that we can feed the population now and in the future.

Mrs Sue Dow
55 Heyes Avenue
Rainford
St Helens
Merseyside
WA11 8AW

Mr Peter Dow
55 Heyes Avenue
Rainford
St Helens
Merseyside
WA11 8AW

9 March 2019

RO0477



St. Helens
Council

① - LPA06 PF0073
② - Statement of Common Ground 84

St Helens Borough Local Plan 2020-2035 (Submission Draft)

Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title:
First Name: <u>Louise</u>	First name:
Last Name: <u>Dawling</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>2 Rusby Park Cottages</u>	Address:
<u>Island Brow</u>
<u>St Helens</u>
Postcode: <u>WA11 2APN</u>	Postcode:
.....	Tel No:
.....	Mobile No:
.....	Email:

Signature:	Date: <u>23rd Feb 2019</u>
------------------	----------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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RETURN DETAILS

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St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

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Telephone: **01744 676190**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LPA06 Site 1415	North of Billing Road	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified. The council should be put to strict proof of its population estimates. The population of St Helens has declined since 1981 - where are all these extra people coming from?</p> <p>One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict land and urban land. Using greenbelt fails to encourage this. The release of greenbelt will cause significant harm to the purpose of the greenbelt. Housing in this area is not sustainable. Use of cars is being encouraged. There is no statement of common ground with neighbouring authorities.</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete This land from the proposed removal from the greenbelt
 All derelict and Brownfield to be used before greenbelt can even be considered as a last resort.
 Greenbelt should be maintained for agriculture and greenspace.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

914

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Louise

Last Name: Dowling

Organisation/company: _____

Address: 2 Rushy Park Cottages

Islands Brow

St Helens

Postcode: WA11 9PN

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 23rd FEB 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

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**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy <i>LPA05 Site IHA</i>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p><i>The council should be put to strict proof of its population estimates. The population of St-Helens has declined since 1981. Where are all these extra people coming from. One of the purposes of the greenbelt is to assist with urban regeneration by encouraging the recycling of derelict land. The release of greenbelt land will cause significant harm to the purpose of the greenbelt. Housing in this area is not sustainable because there are no schools, doctors etc. Access to the site on the roads available would be inadequate. There is no statement of commingled with neighbouring authorities.</i></p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the removal of the greenbelt.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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RO0478

① - LPAOS ② - Statement of Common Ground
② - LPAOS 197

PF0177

Ref: LPSD

01 MAR 2019
(For official use only)



St Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Marlene

Last Name: Downey

Organisation/company: _____

Address: 261, LIVERPOOL RD

Maydock, St Helens

M'side

Postcode: WA11 9RT

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 25/2/19

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☒ Yes (via email)

☐ No

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If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LPA05 SITE 2HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>Don't Know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

The council should be put to strict proof of its population estimates
 The population has been in decline since 1981. Where are all these extra people coming from?
 The release of Greenbelt will cause significant harm to the purposes of Greenbelt. There is no common ground with neighbouring authorities.
 Housing in this area isn't sustainable because of the lack of school places, GP's surgeries, bus routes + other services
 The access to the site is inadequate.
 There are existing flooding problems at this site any remedies to prevent this would place greater amounts of water to be
 brook

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal
from the greenbelt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy WAO4 SKE2 2EA SEA 6EA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <u>Don't Know</u>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

NOT JUSTIFIED - the Council should be put to strict proof of the need for this type of development, in this position & on this scale. One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict + urban. Using Greenbelt fails to encourage this. The release of Greenbelt will cause significant harm to the purposes of the Greenbelt. High volumes of predicted traffic, will add to the already over capacity of the highways in the vicinity. The Council has already granted planning permission in the Greenbelt in respect of site 2EA - Honda Farm North.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Modifications

Delete this land from the proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
----	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0479

201

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:
www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**.
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: DEREK

Last Name: DOWNEY

Organisation/company: _____

Address: 261 LIVERPOOL ROAD

HAYDOCK

ST. HELENS

Postcode: WA11 9RT

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 25/2/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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3. To which part of the Local Plan does this representation relate?							
Policy LPA 05 SITE 2 HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	DONT KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	LAST 2000 OBJECTORS WERE IGNORED.
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>PURPOSE OF GREENBELT IS TO PROTECT GREEN FIELD AND ENCOURAGE URBAN REGENERATION USING BROWN FIELD SITES FIRST.</p> <p>HOUSING IN THIS AREA NOT SUSTAINABLE BECAUSE OF LACK OF SCHOOL PLACES, DOCTORS SURGERIES BUS ROUTES - - ROADS ALREADY CONGESTED.</p> <p>THE ACCESS TO THE SITE IS INADEQUATE, A LEFT ON LEFT OFF FROM THE EAST LANCASHIRE ROAD IS NOT SAFE. PROPOSAL FOR A JUNCTION AT LIVERPOOL ROAD / VICARAGE ROAD WOULD PUT ADDITIONAL TRAFFIC ON AN ALREADY OVERSTRETCHED HIGHWAY SYSTEM.</p> <p>THERE ARE EXISTING FLOODING PROBLEMS AT THIS SITE INCREASED HOUSING WOULD INCREASE THE RISK OF FLOODING.</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE
PROPOSED REMOVAL FROM GREENBELT.

TAKE ACCOUNT OF ALL ONGOING DEVELOPMENTS IN LOCAL AREA. THAT HAVE HAD A NEGATIVE EFFECT ON THE ENVIRONMENT
E.G. INCREASED POLLUTION RE WAREHOUSE DEVELOPMENTS - VEHICLES INCREASED BY 8,600 PER DAY.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

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St. Helens
Council

202

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: DEREK

Last Name: DOWNEY

Organisation/company: _____

Address: 261 LIVERPOOL RD

ST. HELENS

Postcode: WA11 9RT

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 25/2/2019

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☐ No

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RETURN DETAILS

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St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

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for each separate comment/representation.**

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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LP004 SITES 2EA 5EA 6EA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

DONT KNOW

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support the legal compliance or soundness of the Local Plan</u>, please also use this box to <u>set out your comments.</u></p> <p>NOT JUSTIFIED - THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF THE NEED FOR THIS TYPE OF DEVELOPMENT IN THIS POSITION AND ON THIS SCALE. THERE ARE LARGE AREAS OF BROWNFIELD SITES IN ST HELENS.</p> <p>THE RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSE OF THE GREENBELT.</p> <p>THE RISK OF FLOODING FURTHER DOWN CLIPSET BROOK WILL BE EXACERBATED BY FUTURE DEVELOPMENT AT THIS LOCATION.</p> <p>HIGH VOLUMES OF PREDICTED TRAFFIC WILL ADD TO THE ALREADY OVER CAPACITY ON THE HIGHWAYS IN THE VICINITY.</p> <p>POSITION LEVELS ALREADY PASSED ACCEPTABLE LEVELS</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE
PROPOSED REMOVAL FROM
GREEN BELT

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0480



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1040
13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MR</i>	Title:
First Name: <i>FRANCIS</i>	First name:
Last Name: <i>Doyle</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>132 CHESTER LANE SUTTON MANOR</i>	Address:
Postcode: <i>WA9 4DE</i>	Postcode:
	I No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

23-3-2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☒ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO0481



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: SYLVIA	First name:
Last Name: DOYLE	Last Name:
Organisation/company:	Organisation/company:
Address: 132 CHESTER LANE SUTTON MANOR, ST. HELENS	Address:
Postcode: WA9 4DE	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

23-3-19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO0482



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

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This form has two parts;
Part A – Personal Details
Part B – Your Representation(s).

1042

13 MAY 2019

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: Lee	First name:
Last Name: Doyle	Last Name:
Organisation/company:	Organisation/company:
Address: 4, Parkside Ave. Sutton Manor St. Helens	Address:
Postcode: WA9 4DT	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

23/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO0483



St Helens Borough Local Plan 2020 - 2023 Representation

PAUL DRAPER

to:

planningpolicy

12/03/2019 22:59



1 Attachment



Paul's Planning reply.pdf

Dear sir/Madam,

Please find attached my completed representation form regarding proposed development of the Garswood area.

regards,

Paul Draper



St Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: BRYAN PAUL

Last Name: DRAPER

Organisation/company: _____

Address: 10 SELKIRK AVE

GARSWOOD

ASHTON-IN-MAKERFIELD

Postcode: WN4 0UF

Tel No: _____

Mobile No: _____

Email: _____

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____ Date: 12.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

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Town Hall
Victoria Square
St Helens
WA10 1HP**

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Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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NEXT STEPS

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3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	✓	Habitats Regulations Assessment	✓
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.</p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>IT IS NOT JUSTIFIED BECAUSE THERE IS AN ABUNDANCE OF BROWN FIELD SITES THAT COULD BE BUILT ON.</p> <p>IT IS NOT EFFECTIVE BECAUSE IT WILL HAVE MORE OF A DETRIMENTAL IMPACT ON THE LOCAL AREA, FOR THE REASONS LISTED OVERLEAF IN QUESTION 7.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- ① GREEN FIELD SITES SHOULD NOT BE USED WHEN THERE IS AN ABUNDANCE OF BROWN FIELD SITES IN THE AREA. EVEN CONTAMINATED LAND COULD BE CLEANED AND USED.
- ② THERE IS INSUFFICIENT NUMBER OF SCHOOLS, DOCTORS AND SHOPS TO PROVIDE FOR THE NUMBER OF HOMES PROPOSED.
- ③ THIS LAND HAS BEEN THE HABITAT FOR LAPWINGS FOR OVER 40 YEARS. WE COULD LOSE THEM FROM OUR AREA FOREVER.
- ④ WILL PRODUCE EVEN MORE TRAFFIC AND POLLUTION ONTO OUR ROADS.
- ⑤ THE CURRENT VILLAGE OF GARSWOOD WOULD BECOME JUST AN IMMENSE ESTATE, SIMILAR TO THE NEARBY WINSTANLEY, LOSING ANY VILLAGE CHARACTER THAT MOST RESIDENTS MOVED HERE FOR.

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
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N/A

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Please keep a copy for future reference.

RO0484



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation
(i.e. Comment) Form

joan draper

to:

planningpolicy

12/03/2019 23:07



1 Attachment



Joan's Planning Reply.pdf

Dear Sir/Madam

Please find attached my response to the proposed development of the Garswood Area.

Regards

Joan Draper



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>JOAN ELAINE</u>	First name: _____
Last Name: <u>DRAPER</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>10 SELKIRK AVENUE</u>	Address: _____
<u>GARSWOOD</u>	_____
<u>ASHTON-IN-MAKERFIELD</u>	_____
Postcode: <u>WN4 0UP</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>12/3/19</u>
-----------------------	----------------------

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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St Helens
WA10 1HP**

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Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

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- ② AGRICULTURAL LAND MAY BE MORE IN NEED IN THE FUTURE ESPECIALLY AFTER BREXIT.
- ③ THIS LAND IN GARSWOOD HAS BEEN THE HABITAT FOR LAPWINGS FOR OVER 40 YEARS - WE COULD LOSE THEM FROM OUR AREA FOREVER TOGETHER WITH MANY MORE ANIMALS AND BIRDS.
- ④ IT WILL RESULT IN EVEN MORE TRAFFIC AND POLLUTION ON OUR ROADS. THAT ARE ALREADY CONGESTED.
- ⑤ THE CURRENT VILLAGE OF GARSWOOD WOULD BECOME JUST A HUGE HOUSING ESTATE, SIMILAR TO NEARBY WINSTANLEY, LOSING ANY VILLAGE CHARACTER THAT MOST RESIDENTS MOVED HERE FOR. WE WOULD LOSE OUR COUNTRY WALKING AREA.
- ⑥ SCHOOLS + DOCTORS WOULD STRUGGLE TO COPE.
- ⑦ OUR HOUSES WOULD DEPRECIATE IN VALUE AND MANY RETIRED RESIDENTS COULDN'T AFFORD TO MOVE TO A COUNTRY VILLAGE THAT THEY CHOSE TO LIVE IN.

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

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N/A.

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0485

150093



St Helens Borough Local Plan 2020-2035 (Submission Draft) LPA02 - Site 8HA
 Kathryn Drewitt
 to:
 'planningpolicy@sthelens.gov.uk'
 12/03/2019 14:00

Site 8HA
 ① - Wind
 ② - SN

Dear Sir,

I am writing to formally register my objections to the building of 259 new houses on Site 8HA

The 2 main reasons are simply that it is not necessary to build on this green belt land when there are other sites more suitable or brownfield sites that can be used and secondly Rainford does not have the facilities to cope with another 259 houses adding approximately another 500 cars. ①

The reasons for requiring extra housing in Rainford / St Helens has been shown to be based on figures that are too high and actually that amount of housing is not needed. ①

The figures are flawed and therefore why is Green Belt land being used and taken away ?

There are no exceptional circumstances to do this.

Surely other reasonable alternatives should be fully explored, including brownfield sites and other more suitable sites.

Site HA8 (Rookery Lane) is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector. ①

This is obviously threatened by the proposed removal of this site from the Green Belt which goes against the councils strategy to promote employment and economic growth.

Initially 6 sites around Rainford were proposed and only 4 sites scored 4 negatives on the Sustainability Appraisal and the other 3 have all been discarded so surely HA8 is one of the least appropriate Green Belt sites allocated for housing in Phase 1. ②

The site is also next to industrial employment land and other sites have been excluded because of similar situations to this.

In addition figures show that 936 houses in the borough were classed as being long-term empty in the most recently recorded figures in October 2017.

Council tax figures from October stated there were a total of 2,853 unused homes in the borough.

Surely a priority should be to lower these figures and build less on current Green Belt land. ①

The building planned at the old St Helens Car Auctions site by Carr Mill Dam is a great example of using existing land to build on and improve the area instead of building on existing farming Green Belt land which is just not necessary.

This site should be removed just for all the above reasons.

In addition however, the facilities in Rainford cannot cope with this additional housing, this includes the lack of doctors and dentists and also the increased traffic it brings to the small centre which has extremely minimal parking anyway and also the increased traffic to Rookery Lane and also Thickwood Moss Lane which will now become a dangerous, major cut through to the Rainford ByPass. ①

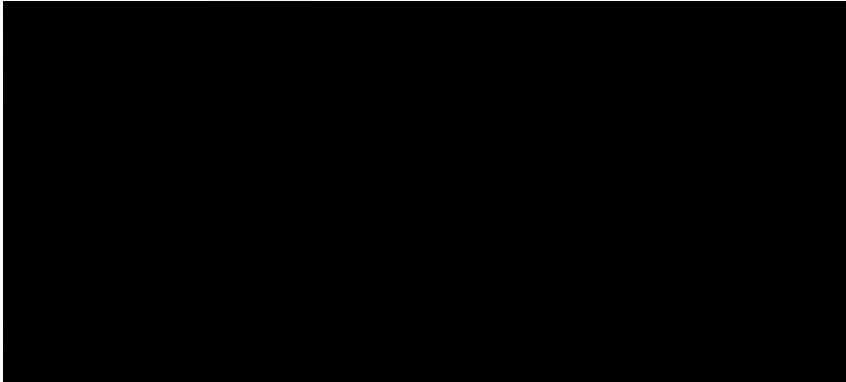
There are also much better places to add additional housing around St Helens, closer to the centre, with better access to public transport and the road network as opposed to building in Rainford itself.

In summary there is no need to build on farming Green Belt when there are much better alternatives to ①

provide additional housing in the area.

Regards

Kathryn Drewitt
1 Rookery Drive
Rainford
Merseyside
WA11 8BB



RO0486



St Helens Local Plan: Submission Draft - Florida Farm North & South

Kathryn Duckworth

to:

planningpolicy

24/02/2019 15:07



1 Attachment



Letter Opposing Planning Consent for Local Plan.doc

Please find my attached representation in relation to the above:

202 Liverpool Road
ASHTON-IN-MAKERFIELD
Wigan
Lancs
WN4 0YT

24th February 2019

St Helens Council
Town Planning
Town Hall
Victoria Square
ST HELENS
Merseyside
WA10 1HP

TO WHOM IT MAY CONCERN

Dear Sir/Madam

**Re: St Helens Borough Local Plan: Submission Draft – Florida Farm
North & South**

I object to the Local Plan proposals in the above areas, for the following reasons:

- Loss of greenbelt/agricultural land – all brownfield land should be cleaned up & utilised for new builds & it should be a mandatory requirement for local authorities to adhere to in order to protect our precious greenbelt land for future generations. If we continue our destruction of greenbelt land, all that our children/grandchildren will be left with is an abundance of urban brownfield land, creating eyesores & in some cases danger for children playing there, as no one will want the hassle & expense of cleaning them up.
- Loss of flora & fauna – it's impossible not to kill a lot of wildlife & reduce their remaining habitat drastically if these proposals succeed. Do you not understand the damage this plan will do to the environment with the ensuing pollution that will occur? We are being told by experts that the way we live our lives at the moment is not sustainable & we are on a precipice – concreting over green belt land should not be allowed, we need green spaces & trees to encourage wildlife.
- Bericote's current warehouse build is an eyesore that the council said would be hidden from view on Liverpool Road with raised banks & trees – not so!, if they're planning to hide it with trees that is a very expensive option or are we having saplings that we take years to grow (which in itself it not what we were led to believe) or is it a case of

1 and 2

2

nothing will be done as you have got what you wanted so to hell with the residents.

- Risk of flooding at Springfield Park & Clipsley Brook again & possibly other areas as well if more land is covered in concrete.
- Proximity to existing residential areas, which could be stressful & result in a devaluation of these properties.
- Noise from vehicles arriving/departing from the proposed 24 hour site operation & the loud reverse warning noise they make.
- Light pollution – has an effect on wildlife, our ecosystem & people who are unfortunate enough to live in close proximity to excessive artificial lighting.
- Road congestion – the proximity of this area to M6 motorway, East Lancs Road & Haydock Industrial Estate has always meant that it is very heavily used & often leads to a congested network of roads. As local residents are fully aware, this whole area becomes grid-locked on a regular basis due to an accident occurring within this road network.
- Pollution from HGV diesel particulates & vehicles used by employees at the proposed development.
- The current levels of noise & vibration from HGVs already has an effect on residents' lives. The vehicles thunder up & down these roads, causing windows to rattle, manhole/grid covers become loose & noisy & having windows open means you can hear the noise inside your home.

land 2

Please do not allow the destruction of any more of our precious greenbelt land by allowing profit orientated developers to dictate how our community should be carved up. There are numerous empty units & brownfield sites across Merseyside & these should & must be the first priority for this development – 'HANDS OFF HAYDOCK GREENBELT – NO MORE DEVELOPMENTS ON FLORIDA FARM'

Yours sincerely

Kathryn Duckworth

RO0487



St. Helens
Council

① LPA05 PFO068
② Statement of Common Ground 80

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019
(For official use only)

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Part B - Your Representation(s)

PART A - YOUR DETAILS

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01 MAR 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr.</u>	Title: _____
First Name: <u>JOHN</u>	First name: _____
Last Name: <u>DUCKWORTH</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>2 Rushy Park Cottages</u>	Address: _____
<u>Islands Brow</u>	_____
<u>St Helens</u>	_____
Postcode: <u>WA11 9PN</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted]	Date: <u>23rd FEB 2016</u>
-----------------------	---------------------------------------

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ ~~No~~

By Post please

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WA10 1HP**

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3. To which part of the Local Plan does this representation relate?

Policy LPA05 Rondel Farm South	SITE 24A	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)								

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Please tick as appropriate

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If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Not justified - The council should provide strict proof of population estimates. The population of St. Helens has been in decline since 1981.

Building on greenfield does not encourage use of urban land. Releasing greenfield land cause significant harm to the purpose of the greenfield. Housing in this area isn't sustainable because of lack of facilities. Access to the site is inadequate. There are existing flooding problems. There is no statement of common ground with neighbouring authorities.

Please continue on a separate sheet if necessary

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Delete this land from the proposed removal from greenbelt

Please continue on a separate sheet if necessary

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① - LPA06 PFO077
② - Statement of Common Ground 88



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Title: <u>Mr.</u>	Title:
First Name: <u>John</u>	First name:
Last Name: <u>Duckworth</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>2 Rushy Park Cottages</u> <u>Islands Brow</u> <u>St Helens</u>	Address:
Postcode: <u>WA11 9PN</u>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: <u>[Redacted]</u>	Date: <u>23rd FEB 2019</u>
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**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

- Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LPA06 Site 1HS	Normal Billing Rd	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Not justified, the council should be put to strict proof of its population estimates. The population of St Helens has declined since 1981, where are all the extra people coming from regeneration? One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict land and other urban land using greenbelt fails to encourage this. The release of greenbelt will cause significant harm to the purposes of the greenbelt. Housing in this area is not sustainable. Use of cars is being encouraged. There is no statement of common ground with neighbouring authorities authorities.</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the greenbelt

There are many derelict brownfield sites in St Helens. Greenbelt should not even be considered until all these sites are used first. Greenbelt land will be needed to sustain food in this country in the near future production

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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102



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

(For official use only)

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Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR.

First Name: JOHN

Last Name: DUCKWORTH

Organisation/company: _____

Address: 2 Rushy Park Cottages

Island Brow

St. Helens

Postcode: WA11 9PN

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 23rd FEB 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ ~~NO~~ By Post please

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

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**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

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planningpolicy@sthelens.gov.uk

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Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy LIA04 SITE 2EA SEA		Paragraph/ diagram table Between Haydock Lane + Liverpool Road		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>not justified - the council should be put to strict prob of the need for this type of development in this position and on this scale. The release of greenbelt will cause significant harm to the purpose of the greenbelt. The council has already gained planning permission in the greenbelt in respect of 2EA - Florida Farm North. Risk of Flooding further down the Clipseley Brook will be exacerbated by this development. Traffic will cause problems. There is no statement of common ground between neighbouring authorities.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete This land from the proposed removal from the greenbelt.

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

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112

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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01 MAR 2019
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Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr. John</u>	Title: _____
First Name: <u>John</u>	First name: _____
Last Name: <u>Duckworth</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>2 Rushy Park Cottages</u>	Address: _____
<u>Islands Brow</u>	_____
<u>St Helens</u>	_____
Postcode: <u>WA11 9PN</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: _____	Date: <u>23rd FEB 2019</u>
------------------	----------------------------

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☐ Yes (via email)

☒ No

By post please

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

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PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?								
Policy LPA05 site IHA	Source of Billing Road west of Smock Lane	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
Other documents (please name document and relevant part/section)								

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The Council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981, where are all these extra people coming from - One of the purposes of the green belt is to assist urban regeneration by encouraging the recycling of derelict and urban land - using green belt fails to encourage this. The release of green belt will cause significant harm to the purpose of the green belt. Housing in this area isn't sustainable because of lack of schools, doctors. Access to the site on the roads would be inadequate. There is no statement of common ground with neighbouring authorities.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the removal
of the greenbelt.

To take this land would ruin a beautiful area
and would be a travesty.

~~As~~ As proved recently with worries about imported
produce. We need all the greenbelt we can to grow
our own crops! Once greenbelt is gone this is
impossible.

Please continue on a separate sheet if necessary

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✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

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--

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RO0488

119 SIGNATORIES

LP0016

St Helens
Council

(16)

13 MAR 2019

Ref: LPSD

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St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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3HS

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

① - LPA06

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: DEBORAH	First name:
Last Name: DUFFY	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 180 TWO BUTT WANE RAINHILL, PRESCOT MERSEYSIDE	Address:
Postcode: L35 8PT	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 19/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

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Yes ☒ (Via Email)

No ☐

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Town Hall
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St.Helens
Merseyside
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

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planningpolicy@sthelens.gov.uk

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Email: planningpolicy@sthelens.gov.uk
Telephone: 01744 676190

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PART B – YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?

Policy	LP06 LP06	Paragraph / diagram / table	345	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	X	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/> Don't Know <input checked="" type="checkbox"/>	No <input type="checkbox"/> Don't Know <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>	} NO!
Justified?	<input checked="" type="checkbox"/>	
Effective?	<input checked="" type="checkbox"/>	
Consistent with National Policy?	<input checked="" type="checkbox"/>	

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

- We are concerned about the inflated St Helens Council's figures for a) the number of new houses (7245 - table 4-6) that the Council state they need to build over the next 15 years, as documented in their local housing plan and b) the inflated figure of 288 hectares (table 4-5) of additional Green Belt land that they state they require to build these houses.
- When St Helens Council compiled their local housing plan they did not have a Brownfield Register. They have one now but we feel that St Helens Council seem to be only considering a small proportion of Brownfield land available to them for the building of houses.
- Due to the progressive decline of the population of St Helens, since 1981, the Office for National Statistics (ONS) suggests that St Helens Council would require approximately 383 new houses to be built every year for 15 years (5745 houses). NOT the figure of 7245 houses (table 4-6) that the Council state they need to build. contd... Pgs 1-4.

Please continue on a separate sheet if necessary

Mrs Deborah Duffy, 180 Two Butt Lane, Rainhill, L35 8PT

Policy - LPA06

Paragraph - 3HS

9/8/19

(1)

Contd.

This would therefore suggest that the Council WANT to build 1500 more houses than the ONS suggests that the St. Helens area NEEDS

- We have been informed that the present St Helens Council Brown Field Register could accommodate developments for approximately 5,800 new houses. We would therefore suggest that if the Brown Field sites were developed then the ONS figure of 5745 houses could be easily accommodated without destroying the Green Belt land.
- We have been advised that only 57 hectares of additional Green Belt land and NOT the 288 hectares proposed by the Council (Table 4-5), would be more than adequate for the building of these additional 1500 houses, but may we emphasise again these are houses that the ONS figures suggest that the Borough of St Helens does NOT NEED
- Since the mid 1980's there has been a steady decline in industry in the St Helens area and therefore the area of 3HS (Eccleston Park Golf Club - EPGC) relies predominantly upon employment outside of this area to provide income-based salaries to purchase the higher-priced property.
- The area of 3HS (EPGC) is situated between 3 railway stations but there is NO parking at Eccleston Park Station and only limited parking at Prescott and Rainhill Stations where the parking facilities are fully utilised before 8am now. Commuters cars fill the surrounding roads, creating congestion and disgruntled residents.
- The infrastructure around the area of 3HS (EPGC) is serviced by 2 'B' roads (Rainhill Road and Portico Lane) and 1 'C' road (Two Butt Lane). In our experience these roads presently are unable to support the current levels of traffic, especially at peak times - school drop off/collection, Whiston Hospital

Mrs Deborah Duffy, 180 Two Butt Lane, Rainhill, L35 8PT
Policy - LPA06 Paragraph - 3HS

9/3/19

visiting times, residents making their way to work directly or trying to access the Motorways (M62, M57) or the local train stations, to commute to work.

Many of us have experienced an increase in our travel times due to the increase in traffic on our local roads and the roads surrounding us (3HS) including the only single carriage 'A' road (Warrington Road) in the area.

- St Helens Council made the decision in December 2018 to take 3HS (EPGC) out of Green Belt status and place it in Safeguarding status but Mulberry Warrington Ltd have purchased the land and their plan is to develop 900+ houses on the site, without the infrastructure to support any development.

In our experience the local road network (many of the junctions in the area around Rainhill are already at capacity and that's according to Council figures), the local Hospital including the A&E facility, the local Primary and Secondary Schools, GP surgeries, Dental surgeries are all full to capacity so any additional housing in this area (3HS) is NOT sustainable, therefore encouraging potential new residents to use their vehicles to access these services out of the area, resulting in further traffic congestion and the smaller 'B' and 'C' roads that service the estates of Rainhill being utilised as 'rat runs'. The residents of Rainhill are already experiencing this problem causing pedestrian danger especially outside our Primary schools (Longton Lane, St Anne's, Eccleston Lane Ends)

This increase in traffic congestion will increase traffic pollution and therefore will affect pedestrian safety (traffic presently has to 'bump' up onto pavements to enable Emergency vehicles to pass) and also increase air pollution in an

Mrs Deborah Duffy, 180 Two Butt Lane, Rainhill, L35 8PT

Policy - LPA06

Paragraph - 3HS

9/3/18

contd.,

(3)

area when under 75's deaths in St Helens from Respiratory Diseases is way above the national average - figures for 2013-2015 show an average of 51.9 deaths per 100,000 population in St Helens, compared to 44.3 for the North West and 33.1 for the rest of England.

- We understand that 3HS (EPGC) is confirmed Zone Two and Zone Three flood plain with a very high water-table (in fact the local Fire Brigade can draw water directly from it, in an Emergency). Golfers who have played on 3HS (EPGC) have experienced times when the course was too water-logged to be played on.

To lose this flood zone by building 900+ homes on it would dramatically affect the ability of the land around it to drain, placing property along the existing brook at risk to flooding.

In our experience those who presently live on Two Butt have opposite 3HS experience poor drainage around our houses and gardens now, due to the land our houses are built on and the underground stream system. To lose the flood zone due to houses being built on 3HS would undoubtedly compromise our properties.

In addition to this United Utilities have expressed that on occasions of heavy rainfall, the water table has been contaminated.

- The Statutory Government Consultant Body, Sport England, objected to the closure of the area 3HS (EPGC) - the golf course, at stage 1 of the local plan. This objection has yet to be answered by St Helens Council - any objection from a Statutory Consultant MUST be resolved or upheld! - St Helens Council have failed to provide compelling evidence that there is an over-subscription of golf, within the local area.

Mrs Deborah Duffy, 180 Two Butt Lane, Rainhill L35 8PT

Policy - LPA 06

Paragraph - 3HS

9/3/18

Contd.,

(4)

- We have been informed that St Helens Council have not consulted with their neighbouring authorities when compiling their housing Plan so there has been 'NO STATEMENT OF COMMON GROUND'.
- Rainhill Parish Council have also objected to the St Helens Local Plan and has opposed planning applications for new development on Green Belt Land (3HS) - see attached letter please.
- The official Government and Council policy states that Green Belt land should only be released in exceptional circumstances. To take 3HS (EPGC) out of Green Belt status and place it into Safeguarding with the potential for subsequent housing development by Mulberry Warrington Ltd., would create a continuous area of urban dwellings and result in the loss of around 59 species of flora and fauna, including more than 13 species that are 'protected!'.

With Green Belt status 3HS (EPGC) would continue to act as a natural green space buffer separating the areas of Whiston, Portico, Eccleston Park, Noughton, Thatch Heath and Rainhill.

In conclusion we strongly feel that the release of Green Belt Land like 3HS (EPGC) would cause significant harm to the residents, infrastructure and health of future generations in Rainhill and in addition would cause significant harm to the whole purpose of GREENS BELT LAND.

The above comments have been compiled by the residents of Rainhill and of the local surrounding areas who live, work, travel through, use the local amenities - those people who regularly use the present infrastructure that is failing us now.

With thanks

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Council in St. Helens should delete this land (3HS) from the proposed removal from The Green Belt - therefore abiding with the National Planning Policy Framework (2019)

St Helens Council should NOT consider removing this land from Green Belt to place it in Safeguarded

Please

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.

Rainhill Parish Council

Clerk to the Council:
Gillian Pinder
12 Towwood Gardens, Rainhill
Prescot, L35 0DX



Planning Policy Team
St. Helens Council
Town Hall
St. Helens

28th January 2017

Dear Sirs,

Local Plan Preferred Options Report – Comments

The following comments are made in response to consultation on the St. Helens Local Plan Preferred Option Report on behalf of Rainhill Parish Council.

The Parish Council deplores this Government's changed policy that requires all local councils to assign even more land for development into a 15 year local plan. This runs counter to the concept of localism. We also note that a failure by St Helens Council to introduce sufficient development land into the plan is very likely to result in indiscriminate development on green land across Rainhill.

The Parish Council wishes to place on record that it shares residents' concerns that the proposal would:

- i. Lead to additional traffic congestion on roads that are already nearing their safe capacity, a problem that will be intensified should the High School expand;
- ii. Have a detrimental effect on highway safety, for vehicles and pedestrians alike;
- iii. Increase the pressure on schools and nurseries, which are already over-subscribed;
- iv. Increase the pressure on social infrastructure e.g. Doctor's surgeries, dentists;
- v. Exacerbate existing health problems for residents, due to increase vehicle pollution; and
- vi. Be detrimental to residential amenity, due to the loss of Green Belt.

The Parish Council believes that the proposed Halshead Village development in Knowsley will add pressure to existing infrastructure and services, once it starts to be developed, and we are on record as expressing our concerns on several occasions and asking St Helens Council to prepare for the consequences of Knowsley Borough's action.

Yours faithfully

Gillian Pinder
Clerk to Rainhill Parish Council



Awarded for excellence

Serving the Rainhill Community since 1894

Rainhill Parish Council

Clerk to the Council:
Gillian Pinder
12 Towwood Gardens, Rainhill
Prescot, L35 0DX



Account Manager
Newgate North

20th February 2018

Dear [redacted]

Eccleston Park Golf Course - Mulbury Homes

Thank you for inviting Rainhill Parish Council to discuss the future of Eccleston Park Golf Course, which, as its name implies, actually lies in Eccleston Parish.

Rainhill Parish Council has always opposed planning applications for new development on Green Belt land. Its longstanding policy is to prioritise the reuse of previously developed land in sustainable locations, before greenfield or Green Belt sites.

The Council also has a longstanding policy to ensure its ability to represent its residents is not compromised by actions which could be perceived as predetermination. As the submission version of the Local Plan is expected later this year, it is considered that a meeting at this stage would be premature because the future of the site is currently unclear.

Although the site has been identified in the St. Helens Local Plan Preferred Options as a strategic housing development site, consultation on this document raised a substantial number of objections, the outcome of which will only be known when the submission version of the Local Plan is released for consultation. The NPPF is clear that the weight afforded to emerging plans is tempered by any unresolved objections. The Council cannot therefore, at the present time, allow the Preferred Options allocation to influence its judgement.

During consultation on the Preferred Options version of the Local Plan, the following concerns were raised by residents and the Parish Council in relation to potential development of Eccleston Park Golf Club, namely the development would:

- i. Lead to additional traffic congestion on roads that are already nearing their safe capacity, a problem that will be intensified should the High School expand;
- ii. Have a detrimental effect on highway safety, for vehicles and pedestrians alike;
- iii. Increase the pressure on schools and nurseries, which are already over-subscribed;
- iv. Increase the pressure on social infrastructure e.g. Doctor's surgeries, dentists;
- v. Exacerbate existing health problems for residents, due to increase vehicle pollution; and
- vi. Be detrimental to residential amenity, due to the loss of Green Belt.

Should the designation ultimately change and a proposal for development be forthcoming the Parish Council will be interested to see how these concerns would be addressed.

If you would like clarification on any point please do not hesitate to contact me.

Yours sincerely,

Gillian Pinder
Clerk to Rainhill Parish Council



Awarded for excellence

Serving the Rainhill Community since 1894

We give our explicit permission for our names to be attached to :- Deborah Duffy

4

1. NAME Mr RAYMOND PRINT NAME DUFFY

ADDRESS

TE 6/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

2. NAME Miss FAYE DUFFY PRINT NAME Faye Duffy

ADDRESS

DATE 6/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

3. NAME SARAH PRINT NAME SATCHELL

ADDRESS

DATE 6/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

4. NAME MRS. LYNDA LAWTON PRINT NAME LYN LAWTON

ADDRESS

DATE 6/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

WE HAVE ALL WORKED ON THIS RESPONSE

we give our explicit permission for our names to be
attached to: - Deborah Duff

④

1. NAME Shirley Walker ~~PRINT NAME~~ SHIRLEY WALKER

ADDRESS

DATE 6/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

2. NAME [REDACTED] ~~PRINT NAME~~ JAMES ORFORD

ADDRESS

DATE 6/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

3. NAME Jackie ~~PRINT NAME~~ Kennedy

ADDRESS

DATE 8/3/17

SIGNATURE

I give explicit permission for my name to be used in this response.

4. NAME JOSIE ~~PRINT NAME~~ DOD

ADDRESS

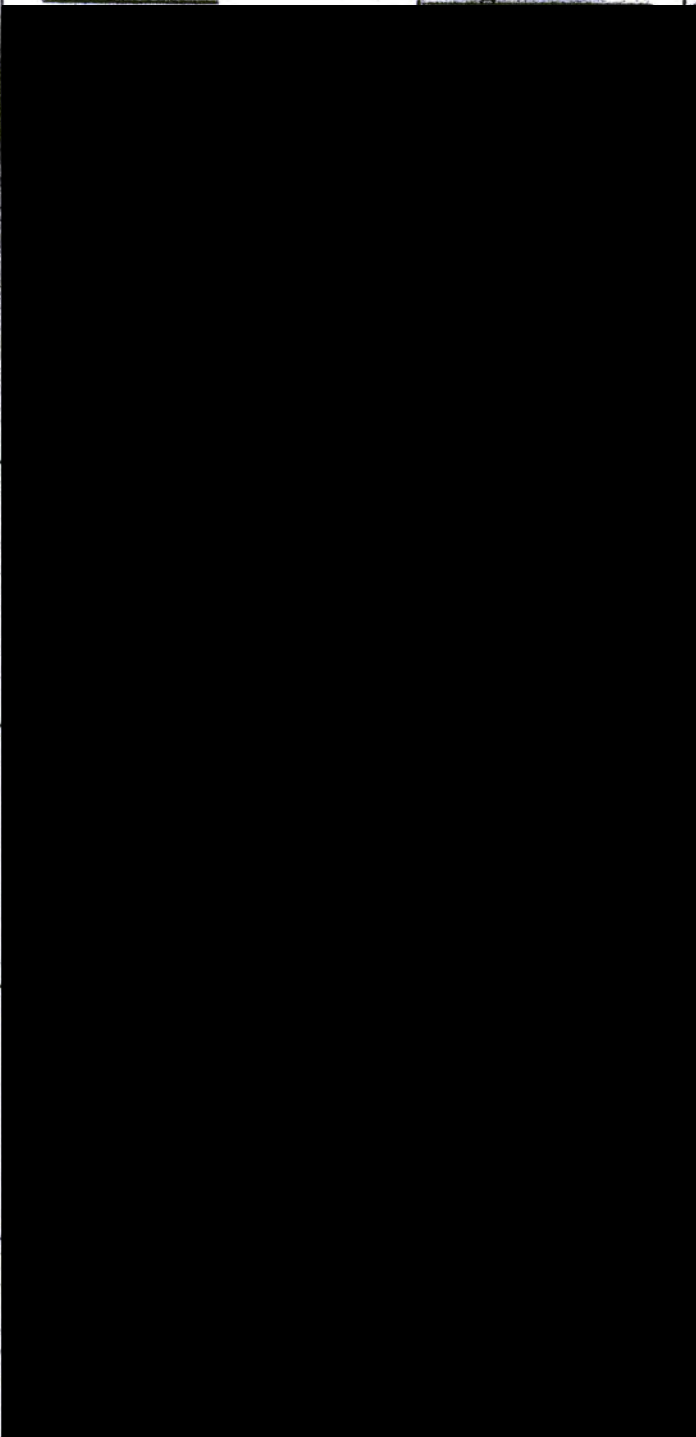
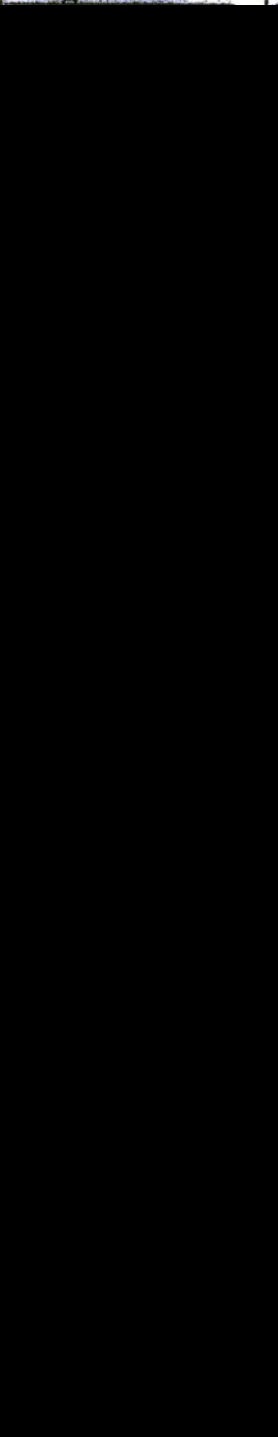
DATE 8/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

WE HAVE ALL WORKED ON THIS RESPONSE

WE GIVE OUR EXPLICIT PERMISSSION FOR OUR NAMES TO BE
ATTACHED TO :- Deborah Duff

<u>Print Name</u>	<u>Address</u>	<u>Signature</u>	<u>Date</u>
Amy Gaskell			9.3.2019
Jon Caekey			9.3.2019.
LESLEY ASH			9.3.2019
CLAIRE ASH.			9.3.19.
Walter Ash			9.3.19
JAN molla			12.3.19

WE HAVE ALL WORKED ON THIS RESPONSE



WE GIVE OUR EXPLICIT PERMISSSION FOR OUR NAMES TO BE
ATTACHED TO:- Deborah Duff

Print Name

Address

Signature

Date

marie leish

8/3/19

GREG OIMARA

8/3/19

EMMA EVANS

9/3/19

SHEILA LAFLEY

9/3/19.

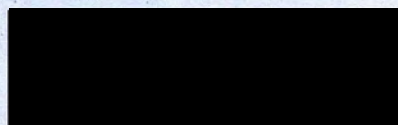
JOAN LAFLEY

9/3/19

GEORGE LONGWORTH

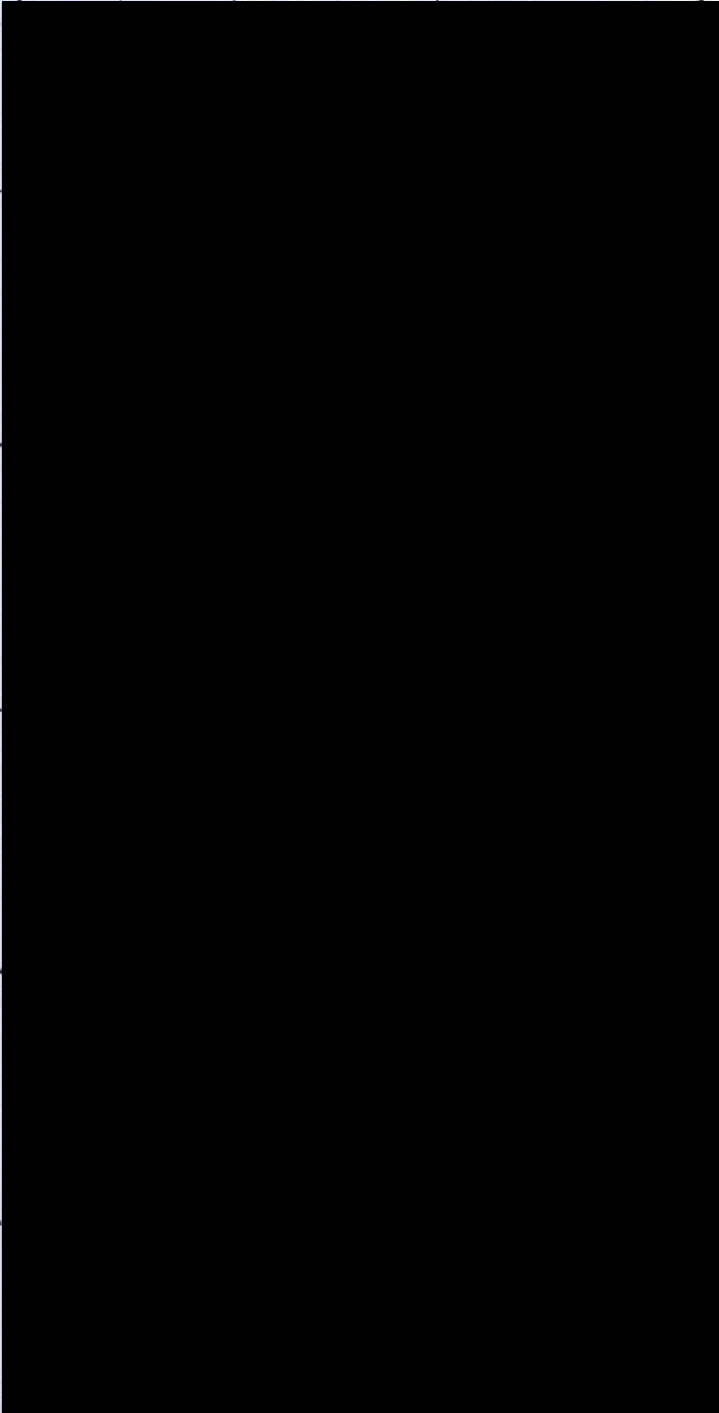
9.3.19

WE HAVE ALL WORKED ON THIS RESPONSE

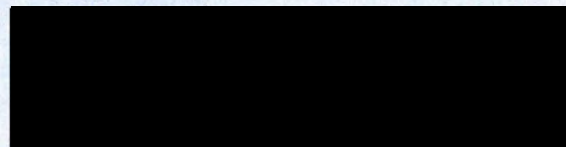


WE GIVE OUR EXPLICIT PERMISSION FOR OUR NAMES TO BE

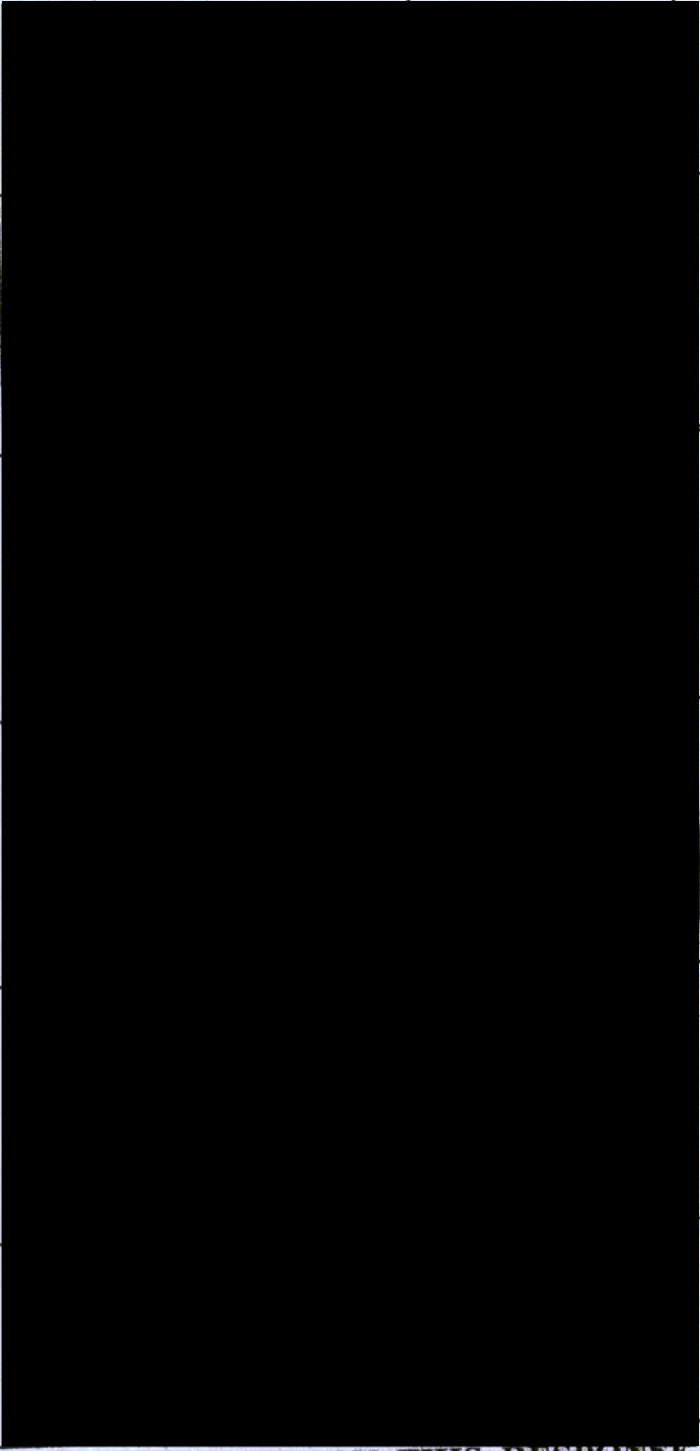
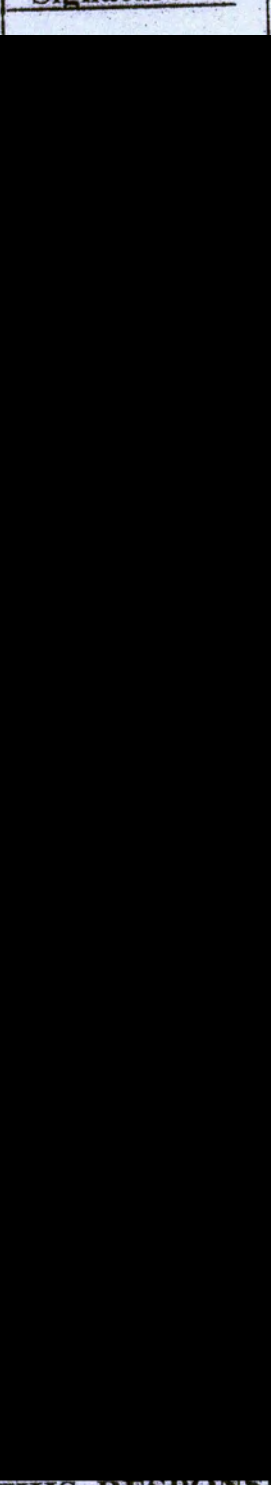
ATTACHED TO:- Deborah Duff

<u>Print Name</u>	<u>Address</u>	<u>Signature</u>	<u>Date</u>
Sayne DAVES			8-3-19,
Wesley Ellis			8-3-19
Sandra Keatley			8-3-19
Carmel Coleman			8-3-19
Cath Hannell			8-3-19
Ann Edge			8/3/19.

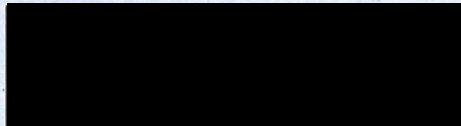
WE HAVE ALL WORKED ON THIS RESPONSE



WE GIVE OUR EXPLICIT PERMISSSION FOR OUR NAMES TO BE
ATTACHED TO:- Deborah Duff

<u>Print Name</u>	<u>Address</u>	<u>Signature</u>	<u>Date</u>
IAN WILCOCK			7/3/2019.
LYNSET PATTEN			8/3/19.
ROBERT BOYLE			8/3/19
Mary Baxter			8/3/19.
STELLA BENTLEY			8/3/19.
Laura Foster			8/3/19

WE HAVE ALL WORKED ON THIS RESPONSE



We give our explicit permission for our names to be attached to:- Deborah Duffy

(4)

1. NAME Ceri George PRINT NAME CERT GEORGE

ADDRESS [REDACTED]

DATE 6/3/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME C.A. PRICE PRINT NAME [REDACTED]

ADDRESS [REDACTED]

DATE 6/3/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME JENNIFER A. HAWKINS PRINT NAME JENNIFER HAWKINS

ADDRESS [REDACTED]

DATE 6/3/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME SHERIDAN WEBB PRINT NAME SHERIDAN WEBB

ADDRESS [REDACTED]

DATE 06/03/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

WE HAVE ALL WORKED ON THIS RESPONSE

[REDACTED]

We give our explicit permission for our names to be attached to:- Deborah Duff

4

1. NAME MR R. LAWTON..... PRINT NAME RON LAWTON.....

ADDRESS

SIGNATURE

DATE 6/3/19.....

I give explicit permission for my name to be used in this response.

2. NAME MRS N. BASNETT..... PRINT NAME NICOLA BASNETT.....

ADDRESS

SIGNATURE

DATE 6/3/19.....

I give explicit permission for my name to be used in this response.

3. NAME MR W. DEVLIN..... PRINT NAME W. DEVLIN.....

ADDRESS

SIGNATURE

DATE 6/3/19.....

I give explicit permission for my name to be used in this response.

4. NAME LYNDSY ANZANI..... PRINT NAME L. ANZANI.....

ADDRESS

SIGNATURE

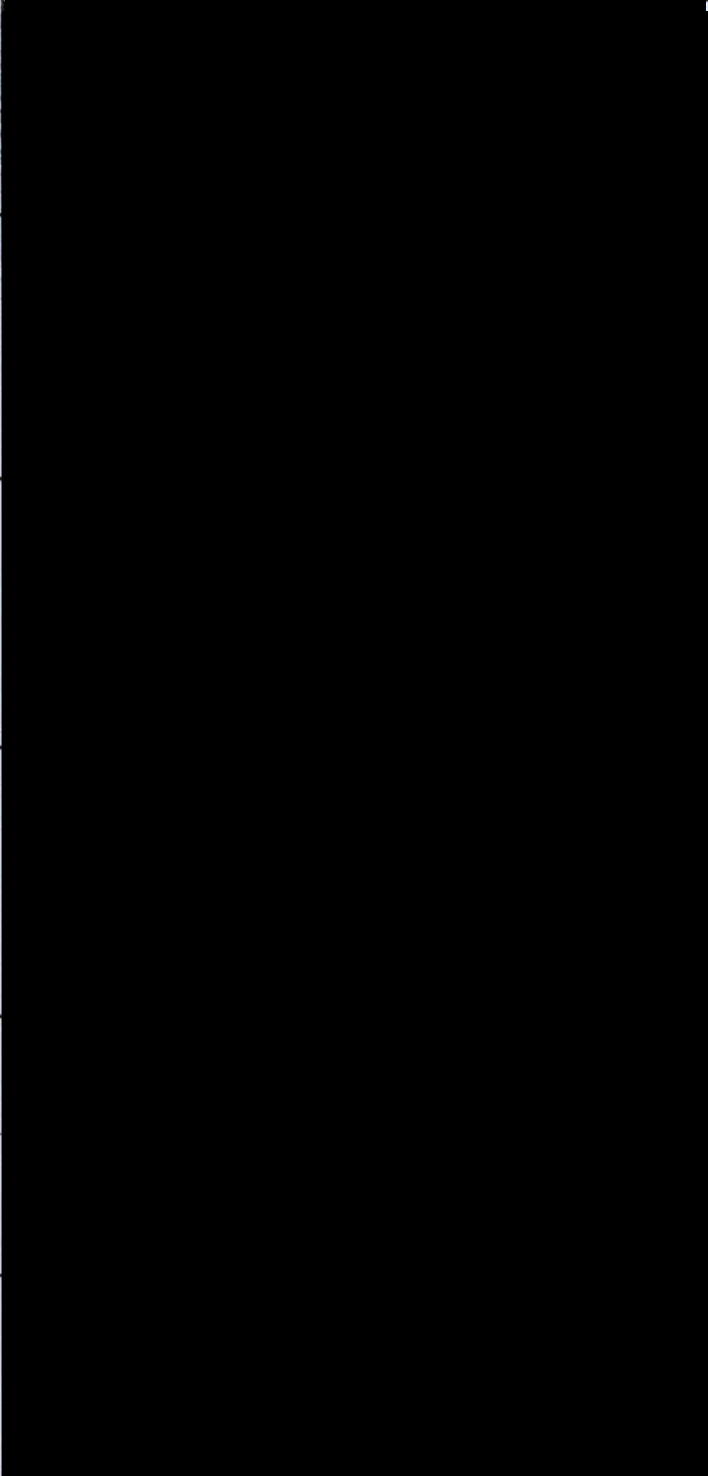
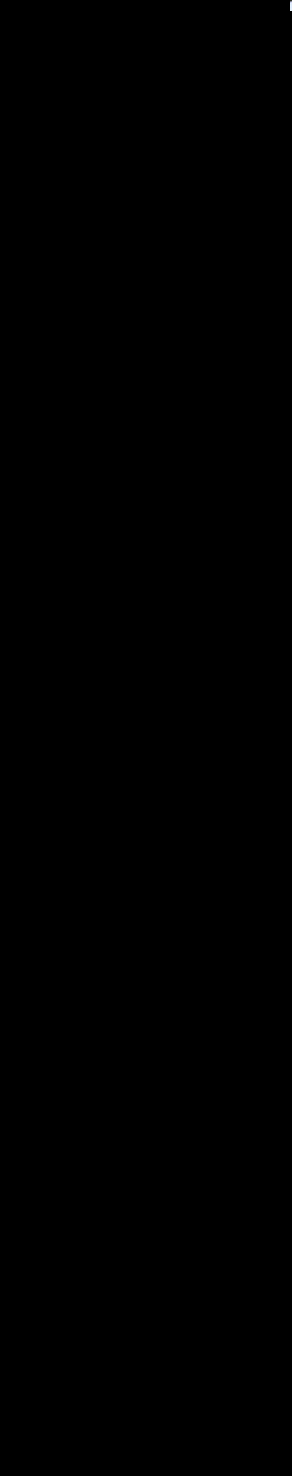
DATE 6/3/19.....

I give explicit permission for my name to be used in this response.

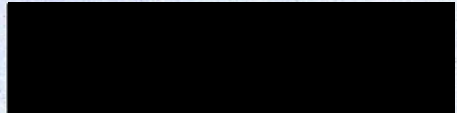
WE HAVE ALL WORKED ON THIS RESPONSE

WE GIVE OUR EXPLICIT PERMISSON FOR OUR NAMES TO BE

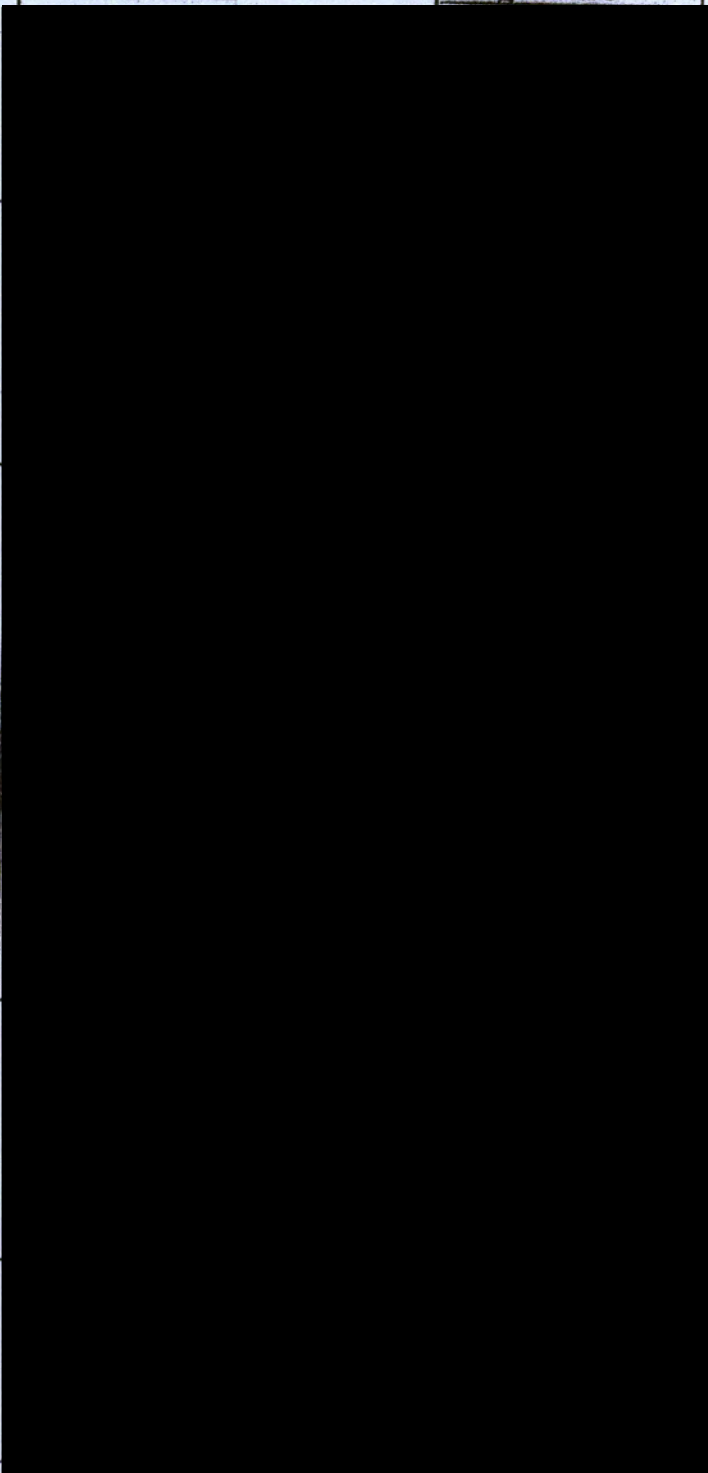
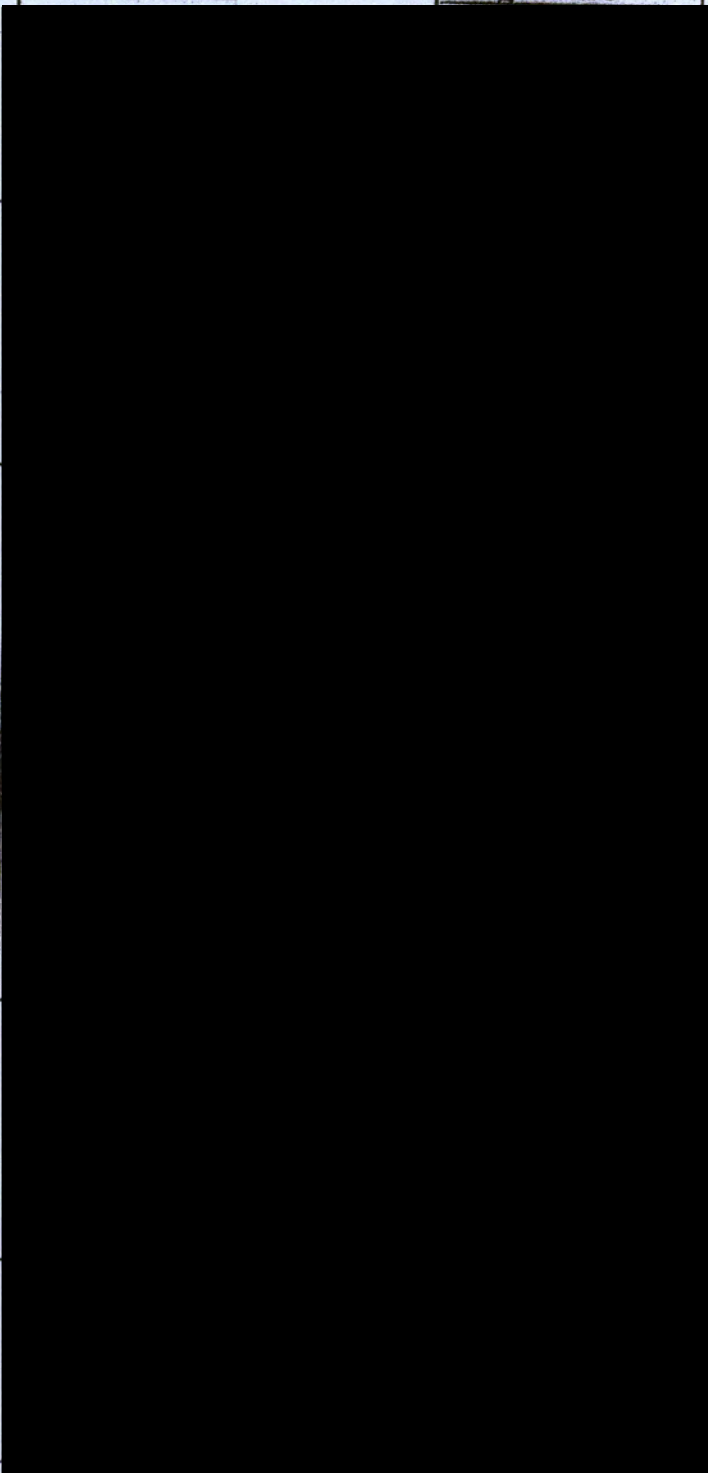
ATTACHED TO:- Deborah Duff

<u>Print Name</u>	<u>Address</u>	<u>Signature</u>	<u>Date</u>
Rosheen Simpson			7/3/19
Barry Hears			7/3/19
Ron Cockshott			07/03/19
SARA RIDGWAY			7.3.19
PAT COCKSHOTT			7-8-19
Rachel Wilcock.			7/8 7.3.19.

WE HAVE ALL WORKED ON THIS RESPONSE



WE GIVE OUR EXPLICIT PERMISSSION FOR OUR NAMES TO BE
ATTACHED TO:- Deborah Duff

<u>Print Name</u>	<u>Address</u>	<u>Signature</u>	<u>Date</u>
PAULA DAINTY			07.03.2019.
Emma McDermott			7.3.19.
Dawn Fieldsend			7.3.19.
Kim McMillan			07/03/19
Allan MOORE			7/3/2019
Maith O'Heera			7/3/19

WE HAVE ALL WORKED ON THIS RESPONSE



WE GIVE OUR EXPLICIT PERMISSSION FOR OUR NAMES TO BE

ATTACHED TO:- Deborah Duff

Print Name

Address

Signature

Date

G. McFARLANE

8/3/19.

Mike Carrigg

8/3/19.

L. Jones

8/3/19.

Joyce Menamara

8/3/19.

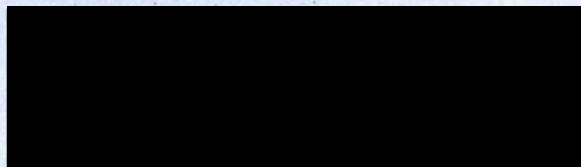
JANET
RAINE

8/3/19.

LAURA
WHITE

8/3/19.

WE HAVE ALL WORKED ON THIS RESPONSE



WE GIVE OUR EXPLICIT PERMISSSION FOR OUR NAMES TO BE

ATTACHED TO :- Deborah Duff

Print Name

Address

Signature

Date

WESLEY
BRIDGE

09-3-19

ALAN BRIDGE

09-03-19

BILL CRELLIN

9/3/19

D. Evans

9/3/19

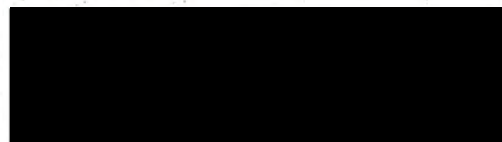
L. R. EVANS

9/3/19

M. Garvey

9/3/19

WE HAVE ALL WORKED ON THIS RESPONSE



We give our explicit permission for our names to be attached to: — Deborah Duff

1. NAME Rebecca Dinnell ~~PRINT NAME~~
ADDRESS [REDACTED]
[REDACTED]
SIGNATURE [REDACTED] DATE 08/03/2019

I give explicit permission for my name to be used in this response.

2. NAME Glynis Reilly ~~PRINT NAME~~
ADDRESS [REDACTED]
[REDACTED]
SIGNATURE [REDACTED] DATE 8/3/19

I give explicit permission for my name to be used in this response.

3. NAME Margaret Chaloner ~~PRINT NAME~~
ADDRESS [REDACTED]
[REDACTED]
SIGNATURE [REDACTED] DATE 8.3.19

I give explicit permission for my name to be used in this response.

4. NAME Cana Prescott ~~PRINT NAME~~
ADDRESS [REDACTED]
[REDACTED]
SIGNATURE [REDACTED] DATE 8/3/19

I give explicit permission for my name to be used in this response.

We have all worked on this response



④

We give our explicit permission for our names to be attached to: - Deborah Dufly

1. NAME MARIE CLARK ~~PRINT NAME~~

ADDRESS [REDACTED]

DATE 8/3/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

2. NAME Amy Hammond ~~PRINT NAME~~

ADDRESS [REDACTED]

DATE 8/3/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

3. NAME Pauline McGorm ~~PRINT NAME~~

ADDRESS [REDACTED]

DATE 8.3.19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

4. NAME Val Winstanley ~~PRINT NAME~~

ADDRESS [REDACTED]

DATE 8/3/19

SIGNATURE [REDACTED]

I give explicit permission for my name to be used in this response.

We have all worked on this response

We give our explicit permission for our names to be attached to:- Deborah Duff

(4)

1. NAME Janet Cameron ~~PRINT NAME~~

ADDRESS

DATE 8-03-2019

SIGNATURE

I give explicit permission for my name to be used in this response.

2. NAME Louise Royce ~~PRINT NAME~~

ADDRESS

DATE 8/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

3. NAME EANE FREDERICKS ~~PRINT NAME~~

ADDRESS

DATE 8/3/19

SIGNATURE

I give explicit permission for my name to be used in this response.

4. NAME Colleen Kerry ~~PRINT NAME~~

ADDRESS

DATE 8/3/19

SIGNATURE

I give explicit permission for my name to be used in

We have all worked on this response

6

WE GIVE OUR EXPLICIT PERMISSION FOR OUR NAMES TO BE
ATTACHED TO :- Deborah Duff

Print Name

Address

Signature

Date

L S Edwards

9/3/19

Gordon
Edwards

9/3/19

S Water House

9/3/19

L Crowther

9/3/19

T Crowther

9.3.19

V Cox

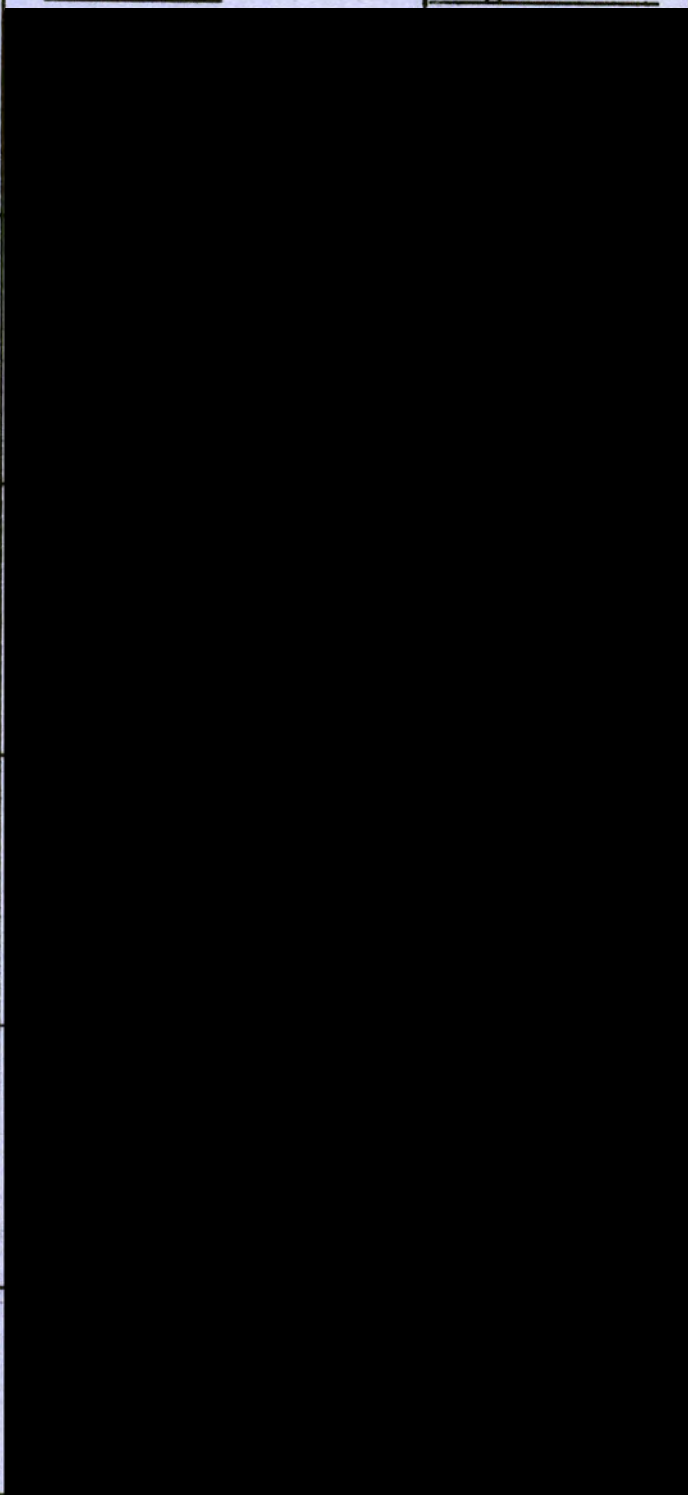
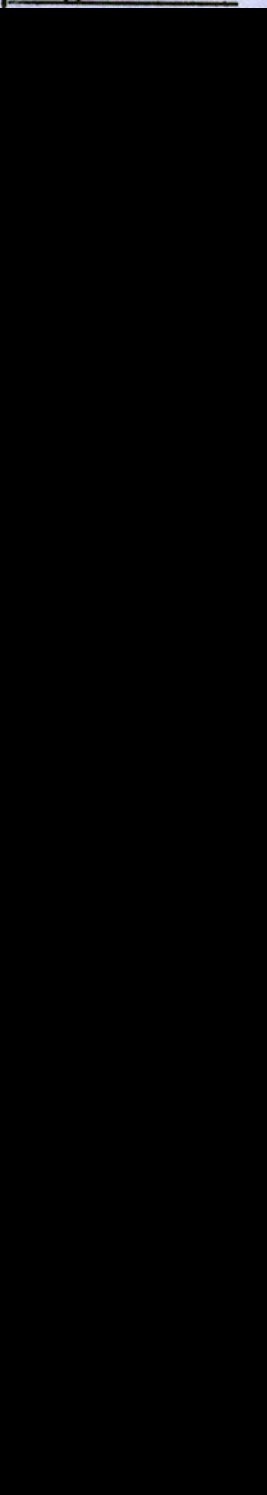
9.3.19

WE HAVE ALL WORKED ON THIS RESPONSE

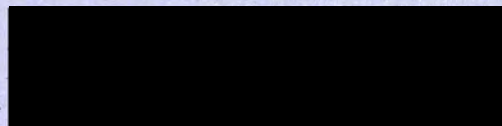


WE GIVE OUR EXPLICIT PERMISSSION FOR OUR NAMES TO BE

ATTACHED TO :- Deborah Duff

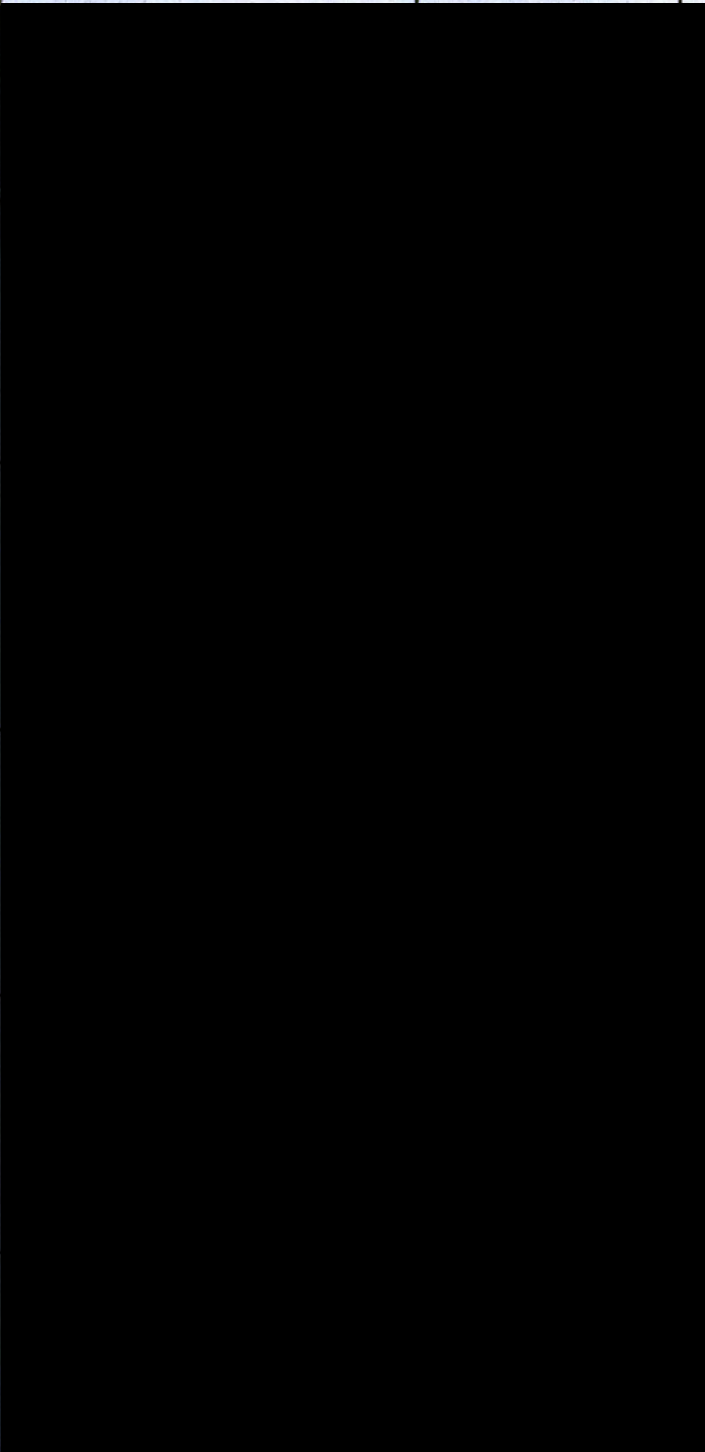
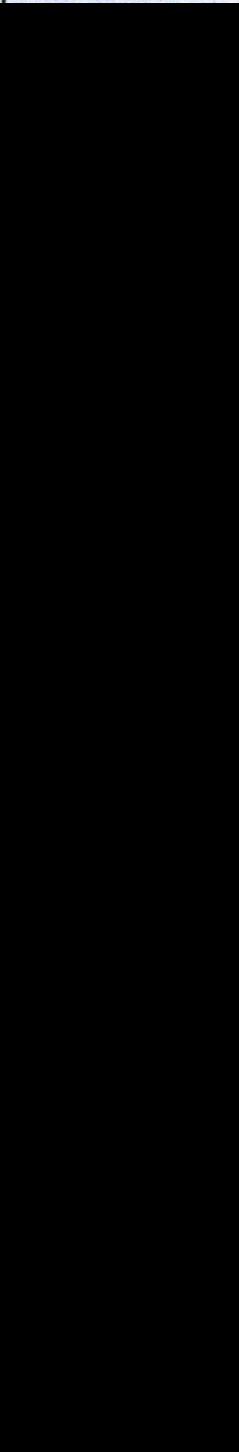
<u>Print Name</u>	<u>Address</u>	<u>Signature</u>	<u>Date</u>
Alicia Carey			11/03/2019
Alice Whiting			11/03/2019
DALE BOARDMAN			11/3/2019.
Lisa McGinlay			11.3.19.
Colette Brown			11/3/19
PETER HEAD			11/3/19

WE HAVE ALL WORKED ON THIS RESPONSE

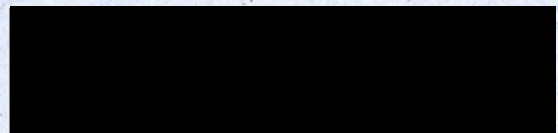


WE GIVE OUR EXPLICIT PERMISSSION FOR OUR NAMES TO BE

ATTACHED TO:- Deborah Duff

<u>Print Name</u>	<u>Address</u>	<u>Signature</u>	<u>Date</u>
JENNIFER LAVENDER			11/3/19
SUE FRITH			11/03/19
SANDRA CORCORAN			11/03/19
ANN DEANS			11/03/19
Linda Matthew			11/3/19
Amona Uhab:-			11/3/19

WE HAVE ALL WORKED ON THIS RESPONSE



WE GIVE OUR EXPLICIT PERMISSSION FOR OUR NAMES TO BE
ATTACHED TO :- Deborah Duff

Print Name

Address

Signature

Date

LINDA SHEA

12-3-19.

Jane Cranik

12/03/19

PAUL DEAN

12/3/19

JOANNE DARWIN

12/3/19.

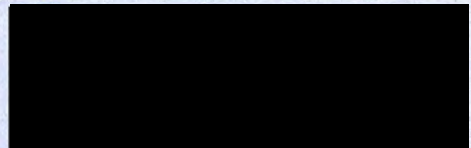
LINDA CARROLL

12/3/19.

Adele Hutter

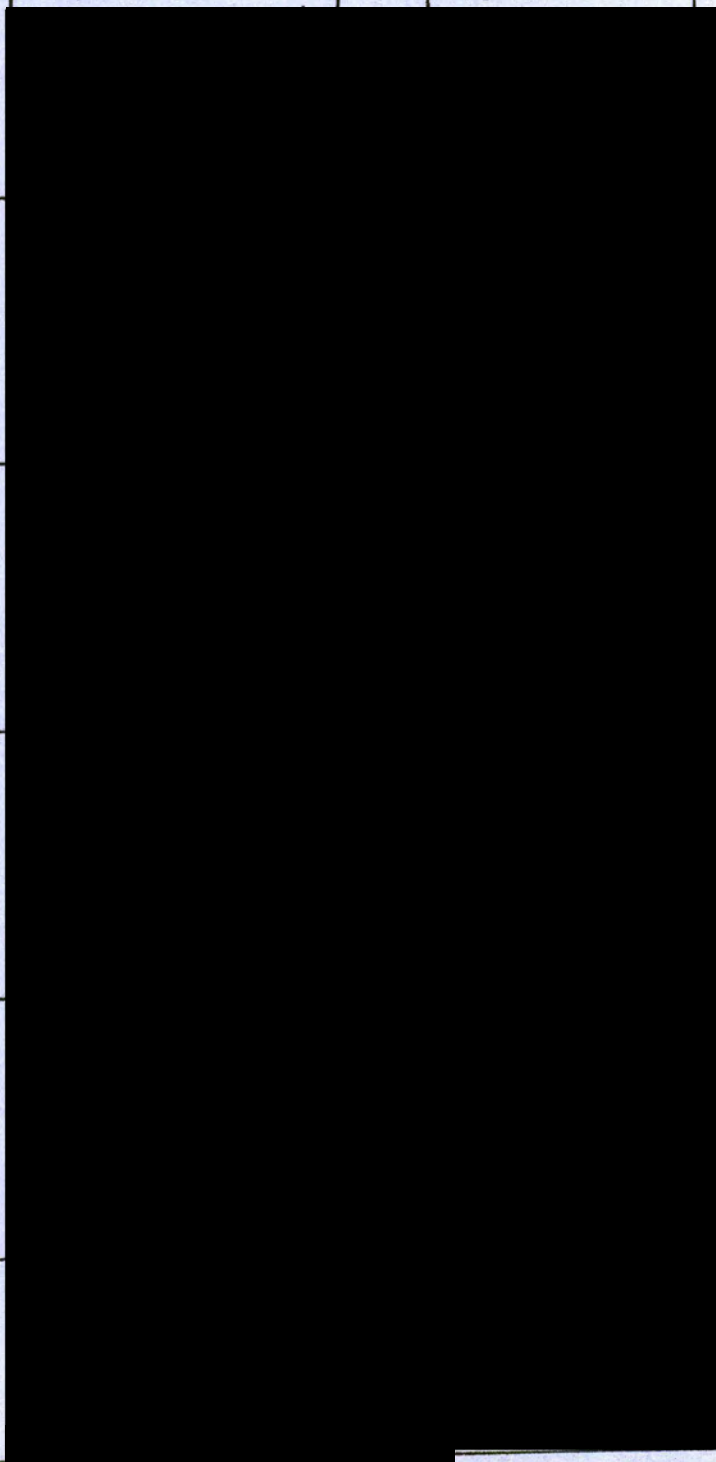
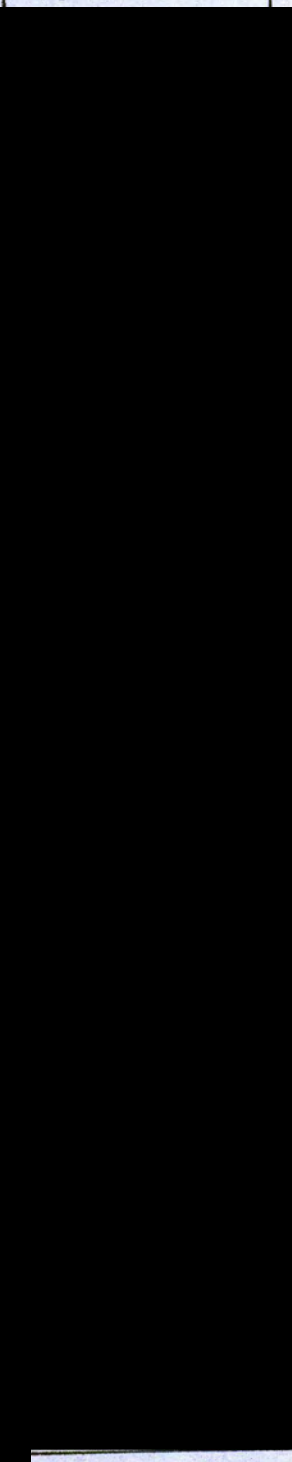
12/3/19

WE HAVE ALL WORKED ON THIS RESPONSE

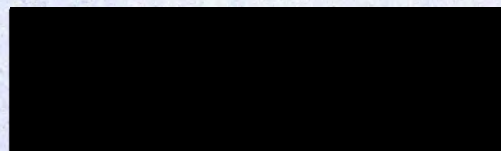


WE GIVE OUR EXPLICIT PERMISSSION FOR OUR NAMES TO BE

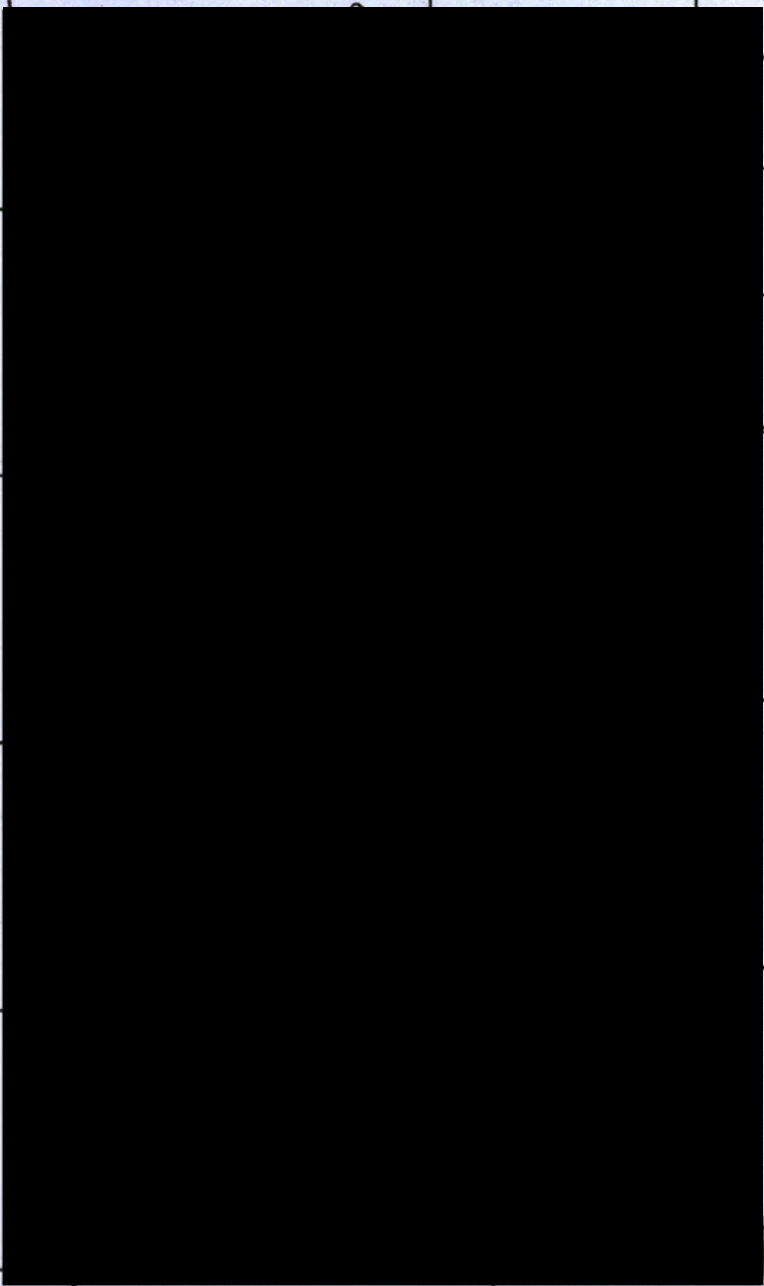
ATTACHED TO :- Deborah Duff

<u>Print Name</u>	<u>Address</u>	<u>Signature</u>	<u>Date</u>
Mollie Dixon			12/03/19
Adele Crawford			12/3/19.
Josie Ormrod.			12/3/19.
Kim O'Callaghan			12/3/19
Sonia Sheils			12.3.19.
Liz Joyce			12/3/19

WE HAVE ALL WORKED ON THIS RESPONSE



WE GIVE OUR EXPLICIT PERMISSSION FOR OUR NAMES TO BE
ATTACHED TO :- Deborah Duff

<u>Print Name</u>	<u>Address</u>	<u>Signature</u>	<u>Date</u>
Jackie Gray			2/3/19
CAROL SEDDON			2/03/19
Deryll Follett			12/03/19
Amanda Clark			12/3/19
Matthew Collier			12/3/19

WE HAVE ALL WORKED ON THIS RESPONSE



We give our explicit permission for our names to be attached to Deborah Duff's.

NAME CHRIS WEBB PRINT NAME _____

ADDRESS _____

DATE 6/3/19

SIGNATURE _____

I give explicit permission for my name to be used in this response

NAME Rebecca Webb PRINT NAME REBECCA WEBB

ADDRESS _____

DATE 6/3/19

SIGNATURE _____

I give explicit permission for my name to be used in this response

NAME _____ PRINT NAME J. SAUNDERSON

ADDRESS _____

DATE 13/3/19

SIGNATURE _____

I give explicit permission for my name to be used in this response

NAME B. SAUNDERSON PRINT NAME B. SAUNDERSON

ADDRESS _____

DATE 13/3/19

SIGNATURE _____

I give explicit permission for my name to be used in this response

We have all worked on this response

WE GIVE OUR EXPLICIT PERMISSSION FOR OUR NAMES TO BE
ATTACHED TO:- Deborah Duff

Print Name

Address

Signature

Date

Jayne Bray

11/3/19

MARGARET
MILLS

11.03.19

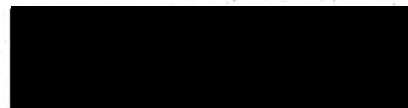
Helen
Rennell

11/3/19

Ross
Wilkinson

11/3/19

WE HAVE ALL WORKED ON THIS RESPONSE



RO0489

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.


This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title:
First Name: <u>SHAUN</u>	First name:
Last Name: <u>DUFFY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>440 LIVERPOOL ROAD</u>	Address:
<u>HAYDOCK ST HELENS</u>
<u>MERSEYSIDE</u>
Postcode: <u>W11 9RP</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: 	Date: <u>25.02.2019</u>
--	-------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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FURTHER INFORMATION

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA04 SITES 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	DON'T KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

NO JUSTIFICATION FOR DEVELOPMENT. THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES. THE POPULATION OF ST. HELENS HAS BEEN IN DECLINE SINCE 1981. WHERE ARE ALL THE EXTRA PEOPLE COMING FROM? HOW HAS THE COUNCIL FORMULATED ITS POPULATION ESTIMATES?

USING GREENBELT FOR DEVELOPMENT FAILS TO ENCOURAGE THE RECYCLING OF DERELICT AND OTHER URBAN LAND INC BROWNFIELD SITES.

THE RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSES OF THE GREENBELT

CONTINUED ON ATTACHED SHEET

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREENBELT

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Shaun Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA04 Site: 2EA, 5EA, 6EA

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are in frequently gridlocked, often putting extra unpaid hours on the working week.

The proposal to remove this land from the Greenbelt for additional warehouse development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed sizeable inappropriate warehouse development on Florida Farm North (adjacent to this land), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock's and the surrounding area's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

The Council has already granted acutely contentious planning permission in the Greenbelt in respect of site 2EA – Florida Farm North. Residents have suffered enough.

There is no statement of common ground with neighbouring authorities.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and it is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. We have suffered enough. The region's limited infrastructure cannot cope with any further development and will only succeed in bringing the area to a halt.

The visual impact from Liverpool Road/Garswood Road will be severe if this Greenbelt is removed to accommodate yet more warehousing would be an unnecessary additional incongruous feature on the landscape with a substantial disparity in scale with the surrounding houses. This will result in fields along Liverpool Road and A580 south being isolated and unviable, encouraging further development proposals to come forward on these sites in future years.

The increased industrialisation of this neighbourhood will make Haydock a less attractive proposition to prospective home buyers, particularly in the areas suffering the greatest impact. This will in due course lead to a significant demise in resident turn over and will ultimately affect the demographics of the area. The long term knock on effects could be catastrophic for Haydock in many ways.

Noise is an underestimated threat that can cause a number of short- and long-term health problems, such as for example sleep disturbance, hormonal & cardiovascular effects, hypertension, poorer work and school performance, hearing impairment, etc. Noise has emerged as a leading environmental nuisance in the WHO European Region, and the public complains about excessive noise more and more often. Release of this Greenbelt for further unnecessary warehouse development is highly likely to create noise over and above WHO guidelines. This is a problem that will be further exacerbated in the evening and early hours i.e. noise and disturbance from vehicles entering and leaving site 24 hours a day and noise from reversing warnings on vehicles throughout the night. Traffic noise on the A58 Liverpool Road is already a big issue [REDACTED] near to the junction with the East Lancashire Road.

It is also worth noting the substandard and dangerous access via Calday Grove/Liverpool Road junction. Visibility for drivers is approximately half of that recommended as a **minimum** in local and national planning guidance (St Helens MBC's "Highways for Adoption – A Planning Guide" and "Places, Streets and Movement" DETR). Residents also face significant time delays and restrictions of access when leaving the site at peak times.

St Helens is already the second noisiest part of the North West according to data gathered by noise monitoring researchers Cirrus.

There's appears to be a Council perception of an overriding need for logistics in Haydock to serve St Helens and the wider city region, but St Helens Metropolitan Borough Council Draft SA/SEA Scoping Report December 2015 provides us with the following statistical information: Employment and economic activity in the borough - 4.80 Transport storage (logistics) is a major strength for St Helens, representing the highest proportion of employees in the whole of the North West (8.7%) of the workforce - 5,200 employees), almost double the national average.

Most of the logistics development is already in Haydock! This will mean that in St. Helens the economy will be even less diverse which is just the opposite of what it needs.

It is also worth noting that "The logistics industry across Europe is set to lose up to 40% of its low skilled workers due to the increasing cost effectiveness of robotic workers." "By 2020, robots are set to be considerably more cost effective than human labour." If the proposal is granted, within a few years we could be left with huge storage depots, lots of traffic congestion, no jobs and no green belt.

Releasing this Greenbelt for warehouse development will undoubtedly increase traffic congestion, increase air pollution, increase noise pollution and increase light pollution, and consequentially it will contribute to the irreparable damage of this habitat and its diverse flora and fauna, some of which are protected species.

The proposed site has substantial environmental interest and potential. The industrialisation of this locality will have an unacceptable adverse effect upon the environment and will change the nature and rural character of the area. Views of open countryside would be removed and there would be a detrimental impact on the openness of the Green Belt.

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Should this Greenbelt be released for warehouse development there will be a substantial increase in the use of HGV's and other road vehicles. Road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And **AIR** pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." Professor Barbara Maher 05/09/2016

Haydock does not need so many warehouses, the growth in the borough does not justify the extra warehouse building. There is no special circumstances that warrant Greenbelt release. The only benefit for releasing Greenbelt for development lies with the developer (maximise profit) and the council (income generated from business rates). It is a Local Plan that appears to be driven by developer's requests and not by local need. There is no benefit to residents. Just more misery.

The points raised throughout the Greenbelt Review (2018) clearly show inconsistencies with very subjective scorings and findings. It is almost as if some of the parcels of land have been pre-selected for safeguarding or discounted from the scoring, findings and rationale documented to produce the desired results.

The local plan is quite simply based on flawed employment forecasts and cannot be supported by historical facts.

①

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019.**

Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MR

First Name: SHAUN

Last Name: UFFY

Organisation/company:

Address: 440 LIVERPOOL ROAD

HAYDOCK ST. HELENS

MERSEYSIDE

Postcode: WA11 9RP

2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:

Date: 25.02.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
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**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

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Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 SITE 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	DON'T KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

USING GREENBELT FOR THE PURPOSES OF DEVELOPMENT FAILS TO ENCOURAGE THE RECYCLING OF DERELICT AND OTHER URBAN LAND INC BROWNFIELD SITES.

THERE IS NO JUSTIFICATION. THE COUNCIL SHOULD BE PUT TO STRICT PROOF OF ITS POPULATION ESTIMATES. THE POPULATION OF ST. HELENS HAS BEEN IN DECLINE SINCE 1981. WHERE ARE ALL THE EXTRA PEOPLE COMING FROM? HOW HAVE THE COUNCIL FORMULATED ITS POPULATION ESTIMATES?

THE RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSES OF THE GREENBELT.

CONTINUED ON ADDITIONAL SHEET

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE GREENBELT REMOVAL PROPOSALS AS PER THE REVISED LOCAL PLAN.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Thank you for taking the time to complete and return this response form.

1800756M

Shaun Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA05 Site: 2HA

Continued from part B box 6

Extra housing in this area isn't sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Doctor's surgeries and schools are full to capacity (nowhere to build new schools) and roads are frequently gridlocked, often putting extra unpaid hours on the working week.

Should this land be released from the Greenbelt, the proposed access to the site is wholly inadequate; a left in/left out from the East Lancashire Road will threaten highway safety and the proposal for a junction at Liverpool Road & Vicarage Road would increase traffic volume to unmanageable levels on an already congested, over-stretched highways system.

The proposal to remove this land from the Greenbelt for development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed contentious warehouse development on Florida Farm North (opposite the greenbelt site set aside for 522 houses), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

Another consequence of releasing this greenbelt for development could be flooding. Has the drainage capacity been adequately assessed and has the Environment agency passed comment as their report would be key? What is the predicted impact on water flow rates and water quality? There are existing flooding problems at this site and any remedies to prevent this would place even greater amounts of water into Clipsley Brook. The proposed development will also surely have a detrimental impact upon the wildlife value of Clipsley Brook, streams, water voles and bluebell woodland etc. The brook would be underground and completely lost forever – the long term effects will be the complete destruction of a natural environment.

There is no statement of common ground with neighbouring authorities.

It is my understanding that the number of existing empty properties together with land that has also acquired planning permission for housing already exceeds the number of houses required for the council to meet their quota. There is no need to release this land from the Greenbelt.

St Helens does not need so many houses, the growth in the borough does not justify the extra house building. There are no special circumstances that warrant Greenbelt release. The only benefit for releasing Greenbelt for development lies with the developer (maximise profit) and the council (income generated from Council Tax). It is a Local Plan that appears to be driven by developer's requests and not by local need. There is no benefit to residents. Just more misery.

The points raised throughout the Greenbelt Review (2018) clearly show inconsistencies with very subjective scorings and findings. It is almost as if some of the parcels of land have been pre-selected for safeguarding or discounted from the scoring, findings and rationale documented to produce the desired results.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and the borough's employers pay 15 per cent below the national average for salaries. A point brazenly publicised by previous developers. It is also widely accepted that Haydock and the roads into the area are often gridlocked, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. There is no incentive for people to move to the area and there doesn't appear to be the financial capability to obtain mortgages for new properties. Has the Council factored any of this information into their assessment?

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Due to the undeniable increase in the use of HGV's whilst building the houses and private car useage that is highly likely to be generated by this unnecessary residential development, road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And **AIR** pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

The proximity of cycle paths (cyclists, joggers and walkers are all at risk) should be incorporated into all independent air pollution investigations and all independent air pollution investigations should be conducted during peak times and not in school holidays.

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

The local plan is quite simply based on flawed employment forecasts and cannot be supported by historical facts.

①

RO0490

748

13 MAR 2019

Ref: LPSD

(For official use only)

St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MC</u>	Title:
First Name: <u>Matthew</u>	First name:
Last Name: <u>Duffy</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>440 Liverpool Road</u> <u>Haydock</u>	Address:
Postcode: <u>WA11 9DD</u>	Postcode:
<div style="background-color: black; width: 100%; height: 40px;"></div>	Tel No:
	Mobile No:
	Email:

Signature: <div style="background-color: black; width: 150px; height: 30px; display: inline-block;"></div>	Date: <u>12.3.19</u>
--	----------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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**Please use a separate copy of Part B
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Policy	LPA05 SITES 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>Don't know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

See attached sheet

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Remove this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Matthew Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA05 Site: 2HA

Continued from part B box 6

Extra housing in this area isn't sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Doctor's surgeries and schools are full to capacity and roads are in constant gridlock, often putting unpaid extra hours on the working week.

The proposed access to the site is wholly inadequate; a left in/left out from the East Lancashire Road will threaten highway safety and the proposal for a junction at Liverpool Road & Vicarage Road would increase traffic volume to unprecedented levels on an already congested, over-stretched highways system.

This proposal does not include the 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated once the new development is in full operation. Using the developer's own figures that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. And this is highly likely to be an underestimate. Haydock's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

Another consequence of this development could be flooding. Has the drainage capacity been adequately assessed and has the Environment agency passed comment as their report would be key? What is the predicted impact on water flow rates and water quality? There are existing flooding problems at this site and any remedies to prevent this would place even greater amounts of water into Clipsley Brook. The proposed development will also surely have a detrimental impact upon the wildlife value of Clipsley Brook, streams, water voles and bluebell woodland etc. The brook would be underground and completely lost forever – the long term effects will be the complete destruction of a natural environment.

There is no statement of common ground with neighbouring authorities.

It is my understanding that the number of existing empty properties together with land that has also acquired planning permission for housing already exceeds the number of houses required for the council to meet their quota.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and the borough's employers pay 15 per cent below the national average for salaries. A point brazenly publicised by developers. It is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. There is no incentive for people to

move to the area and there doesn't appear to be the financial capability to obtain mortgages for new properties. Has the Council factored any of this information into their assessment?

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Due to the undeniably vast increase in the use of HGV's whilst building and private cars that is highly likely to be generated by this unnecessary residential development, road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And **AIR** pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

The proximity of cycle paths (cyclists, joggers and walkers are all at risk) should be incorporated into all independent air pollution investigations and all independent air pollution investigations should be conducted during peak times and not in school holidays.

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019.**

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: Mr

First Name: Matthew

Last Name: Dugg

Organisation/company: _____

Address: 440 Liverpool Road
Haydock

Postcode: WA11 9DD

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 12.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

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Town Hall
Victoria Square
St Helens
WA10 1HP**

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPACY Sites 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>Don't know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

See attached sheet

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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Yes, I wish to participate at the oral examination

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Matthew Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA04 Site: 2EA, 5EA, 6EA

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are frequently gridlocked, often putting extra unpaid hours on the working week.

The proposal to remove this land from the Greenbelt for additional warehouse development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed sizeable inappropriate warehouse development on Florida Farm North (adjacent to this land), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock's and the surrounding area's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

The Council has already granted acutely contentious planning permission in the Greenbelt in respect of site 2EA – Florida Farm North. Residents have suffered enough.

There is no statement of common ground with neighbouring authorities.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and it is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. We have suffered enough. The region's limited infrastructure cannot cope with any further development and will only succeed in bringing the area to a halt.

The visual impact from Liverpool Road/Garswood Road will be severe if this Greenbelt is removed to accommodate yet more warehousing would be an unnecessary additional incongruous feature on the landscape with a substantial disparity in scale with the surrounding houses. This will result in fields along Liverpool Road and A580 south being isolated and unviable, encouraging further development proposals to come forward on these sites in future years.

The increased industrialisation of this neighbourhood will make Haydock a less attractive proposition to prospective home buyers, particularly in the areas suffering the greatest impact. This will in due course lead to a significant demise in resident turn over and will ultimately affect the demographics of the area. The long term knock on effects could be catastrophic for Haydock in many ways.

Noise is an underestimated threat that can cause a number of short- and long-term health problems, such as for example sleep disturbance, hormonal & cardiovascular effects, hypertension, poorer work and school performance, hearing impairment, etc. Noise has emerged as a leading environmental nuisance in the WHO European Region, and the public complains about excessive noise more and more often. Release of this Greenbelt for further unnecessary warehouse development is highly likely to create noise over and above WHO guidelines. This is a problem that will be further exacerbated in the evening and early hours i.e. noise and disturbance from vehicles entering and leaving site 24 hours a day and noise from reversing warnings on vehicles throughout the night. Traffic noise on the A58 Liverpool Road is already a big issue [REDACTED] near to the junction with the East Lancashire Road.

It is also worth noting the substandard and dangerous access via Calday Grove/Liverpool Road junction. Visibility for drivers is approximately half of that recommended as a **minimum** in local and national planning guidance (St Helens MBC's "Highways for Adoption – A Planning Guide" and "Places, Streets and Movement" DETR). Residents also face significant time delays and restrictions of access when leaving the site at peak times.

St Helens is already the second noisiest part of the North West according to data gathered by noise monitoring researchers Cirrus.

There's appears to be a Council perception of an overriding need for logistics in Haydock to serve St Helens and the wider city region, but St Helens Metropolitan Borough Council Draft SA/SEA Scoping Report December 2015 provides us with the following statistical information: Employment and economic activity in the borough - 4.80 Transport storage (logistics) is a major strength for St Helens, representing the highest proportion of employees in the whole of the North West (8.7%) of the workforce - 5,200 employees), almost double the national average.

Most of the logistics development is already in Haydock! This will mean that in St. Helens the economy will be even less diverse which is just the opposite of what it needs.

It is also worth noting that "The logistics industry across Europe is set to lose up to 40% of its low skilled workers due to the increasing cost effectiveness of robotic workers." "By 2020, robots are set to be considerably more cost effective than human labour." If the proposal is granted, within a few years we could be left with huge storage depots, lots of traffic congestion, no jobs and no green belt.

Releasing this Greenbelt for warehouse development will undoubtedly increase traffic congestion, increase air pollution, increase noise pollution and increase light pollution, and consequentially it will contribute to the irreparable damage of this habitat and its diverse flora and fauna, some of which are protected species.

The proposed site has substantial environmental interest and potential. The industrialisation of this locality will have an unacceptable adverse effect upon the environment and will change the nature and rural character of the area. Views of open countryside would be removed and there would be a detrimental impact on the openness of the Green Belt.

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Should this Greenbelt be released for warehouse development there will be a substantial increase in the use of HGV's and other road vehicles. Road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And **AIR** pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." Professor Barbara Maher 05/09/2016

RO0491

13 MAR 2019

Ref: LPSD

(For official use only)



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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title:
First Name: <u>DOROTHY JEAN</u>	First name:
Last Name: <u>DUFFY</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>47 WRIGLEY ROAD</u>	Address:
<u>HAYDOCK ST HELENS</u>
Postcode: <u>WA10 0NN</u>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:	Date: <u>13 3 2019</u>
------------------	------------------------

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Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

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Town Hall
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St Helens
WA10 1HP**

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**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

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3. To which part of the Local Plan does this representation relate?

Policy	LPA04 SITES 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	DON'T KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

THERE IS NO JUSTIFICATION FOR THE DEVELOPMENT OF GREENBELT IN HAYDOCK. THIS COUNCIL, OFFICIALLY THE MOST COMPLAINED ABOUT COUNCIL IN THE MERSEYSIDE REGION, HAS A HISTORY OF IGNORING RESIDENTS WISHES, AND SHOULD BE ORDERED TO PROVIDE STRICT PROOF OF HOW IT OBTAINED ITS POPULATION ESTIMATES. WHAT WAS THE EXACT FORMULA USED TO FORECAST THESE ESTIMATES?

USING GREENBELT FOR DEVELOPMENT FAILS TO ENCOURAGE THE USE OF BROWNFIELD SITES. IT SETS AN UNWANTED PRECEDENT.

CONTINUED ON ATTACHED SHEET.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

REMOVE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREEN BELT

Please continue on a separate sheet if necessary

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Dorothy Jean Duffy

47 Wrigley Road, Haydock, St Helens, WA11 0NN

Policy: LPA04 Site: 2EA, 5EA, 6EA

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are frequently gridlocked, often putting extra unpaid hours on the working week.

The proposal to remove this land from the Greenbelt for additional warehouse development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed sizeable inappropriate warehouse development on Florida Farm North (adjacent to this land), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock and the surrounding area's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

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The visual impact from Liverpool Road/Garswood Road will be severe if this Greenbelt is removed to accommodate yet more warehousing would be an unnecessary additional incongruous feature on the landscape with a substantial disparity in scale with the surrounding houses. This will result in fields along Liverpool Road and A580 south being isolated and unviable, encouraging further development proposals to come forward on these sites in future years.

The increased industrialisation of this neighbourhood will make Haydock a less attractive proposition to prospective home buyers, particularly in the areas suffering the greatest impact. This will in due course lead to a significant demise in resident turn over and will ultimately affect the demographics of the area. The long term knock on effects could be catastrophic for Haydock in many ways.

Noise is an underestimated threat that can cause a number of short- and long-term health problems, such as for example sleep disturbance, hormonal & cardiovascular effects, hypertension, poorer work and school performance, hearing impairment, etc. Noise has emerged as a leading environmental nuisance in the WHO European Region, and the public complains about excessive noise more and more often. Release of this Greenbelt for further unnecessary warehouse development is highly likely to create noise over and above WHO guidelines. This is a problem that will be further exacerbated in the evening and early hours i.e. noise and disturbance from vehicles entering and leaving site 24 hours a day and noise from reversing warnings on vehicles throughout the night.

It is also worth noting the substandard and dangerous access via Calday Grove/Liverpool Road junction. Visibility for drivers is approximately half of that recommended as a **minimum** in local and national planning guidance (St Helens MBC's "Highways for Adoption – A Planning Guide" and "Places, Streets and Movement" DETR). Residents also face significant time delays and restrictions of access when leaving the site at peak times.

St Helens is already the second noisiest part of the North West according to data gathered by noise monitoring researchers Cirrus.

There's appears to be a Council perception of an overriding need for logistics in Haydock to serve St Helens and the wider city region, but St Helens Metropolitan Borough Council Draft SA/SEA Scoping Report December 2015 provides us with the following statistical information: Employment and economic activity in the borough - 4.80 Transport storage (logistics) is a major strength for St Helens, representing the highest proportion of employees in the whole of the North West (8.7%) of the workforce - 5,200 employees), almost double the national average.

Most of the logistics development is already in Haydock! This will mean that in St. Helens the economy will be even less diverse which is just the opposite of what it needs.

It is also worth noting that "The logistics industry across Europe is set to lose up to 40% of its low skilled workers due to the increasing cost effectiveness of robotic workers." "By 2020, robots are set to be considerably more cost effective than human labour." If the proposal is granted, within a few years we could be left with huge storage depots, lots of traffic congestion, no jobs and no green belt.

Releasing this Greenbelt for warehouse development will undoubtedly increase traffic congestion, increase air pollution, increase noise pollution and increase light pollution, and consequentially it will contribute to the irreparable damage of this habitat and its diverse flora and fauna, some of which are protected species.

The proposed site has substantial environmental interest and potential. The industrialisation of this locality will have an unacceptable adverse effect upon the environment and will change the nature and rural character of the area. Views of open countryside would be removed and there would be a detrimental impact on the openness of the Green Belt.

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Should this Greenbelt be released for warehouse development there will be a substantial increase in the use of HGV's and other road vehicles. Road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

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If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

Haydock does not need so many warehouses, the growth in the borough does not justify the extra warehouse building. There is no special circumstances that warrant Greenbelt release. The only benefit for releasing Greenbelt for development lies with the developer (maximise profit) and the council (income generated from business rates). It is a Local Plan that appears to be driven by developer's requests and not by local need. There is no benefit to residents. Just more misery.

The points raised throughout the Greenbelt Review (2018) clearly show inconsistencies with very subjective scorings and findings. It is almost as if some of the parcels of land have been pre-selected for safeguarding or discounted from the scoring, findings and rationale documented to produce the desired results.

The local plan is quite simply based on flawed employment forecasts and cannot be supported by historical facts.



St. Helens
Council

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: DOROTHY JEAN

Last Name: DUFFY

Organisation/company: _____

Address: 47 WRIGLEY ROAD

HAYDOCK ST HELENS

Postcode: WA10 0NN

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 13 3 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

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3. To which part of the Local Plan does this representation relate?

Policy	LPA04 SITES 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	DON'T KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

THERE IS NO JUSTIFICATION FOR THE DEVELOPMENT OF GREENBELT IN HAYDOCK. THIS COUNCIL, OFFICIALLY THE MOST COMPLAINED ABOUT COUNCIL IN THE MERSEYSIDE REGION, HAS A HISTORY OF IGNORING RESIDENTS WISHES, AND SHOULD BE ORDERED TO PROVIDE STRICT PROOF OF HOW IT OBTAINED ITS POPULATION ESTIMATES. WHAT WAS THE EXACT FORMULA USED TO FORECAST THESE ESTIMATES?

USING GREENBELT FOR DEVELOPMENT FAILS TO ENCOURAGE THE USE OF BROWNFIELD SITES. IT SETS AN UNWANTED PRECEDENT.

CONTINUED ON ATTACHED SHEET.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

REMOVE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREEN BELT

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Dorothy Jean Duffy

47 Wrigley Road, Haydock, St Helens, WA11 0NN

Policy: LPA04 Site: 2EA, 5EA, 6EA

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are frequently gridlocked, often putting extra unpaid hours on the working week.

The proposal to remove this land from the Greenbelt for additional warehouse development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed sizeable inappropriate warehouse development on Florida Farm North (adjacent to this land), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock and the surrounding area's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

The Council has already granted acutely contentious planning permission in the Greenbelt in respect of site 2EA – Florida Farm North. Residents have suffered enough.

There is no statement of common ground with neighbouring authorities.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and it is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. We have suffered enough. The region's limited infrastructure cannot cope with any further development and will only succeed in bringing the area to a halt.

The visual impact from Liverpool Road/Garswood Road will be severe if this Greenbelt is removed to accommodate yet more warehousing would be an unnecessary additional incongruous feature on the landscape with a substantial disparity in scale with the surrounding houses. This will result in fields along Liverpool Road and A580 south being isolated and unviable, encouraging further development proposals to come forward on these sites in future years.

The increased industrialisation of this neighbourhood will make Haydock a less attractive proposition to prospective home buyers, particularly in the areas suffering the greatest impact. This will in due course lead to a significant demise in resident turn over and will ultimately affect the demographics of the area. The long term knock on effects could be catastrophic for Haydock in many ways.

Noise is an underestimated threat that can cause a number of short- and long-term health problems, such as for example sleep disturbance, hormonal & cardiovascular effects, hypertension, poorer work and school performance, hearing impairment, etc. Noise has emerged as a leading environmental nuisance in the WHO European Region, and the public complains about excessive noise more and more often. Release of this Greenbelt for further unnecessary warehouse development is highly likely to create noise over and above WHO guidelines. This is a problem that will be further exacerbated in the evening and early hours i.e. noise and disturbance from vehicles entering and leaving site 24 hours a day and noise from reversing warnings on vehicles throughout the night.

It is also worth noting the substandard and dangerous access via Calday Grove/Liverpool Road junction. Visibility for drivers is approximately half of that recommended as a **minimum** in local and national planning guidance (St Helens MBC's "Highways for Adoption – A Planning Guide" and "Places, Streets and Movement" DETR). Residents also face significant time delays and restrictions of access when leaving the site at peak times.

St Helens is already the second noisiest part of the North West according to data gathered by noise monitoring researchers Cirrus.

There's appears to be a Council perception of an overriding need for logistics in Haydock to serve St Helens and the wider city region, but St Helens Metropolitan Borough Council Draft SA/SEA Scoping Report December 2015 provides us with the following statistical information: Employment and economic activity in the borough - 4.80 Transport storage (logistics) is a major strength for St Helens, representing the highest proportion of employees in the whole of the North West (8.7%) of the workforce - 5,200 employees), almost double the national average.

Most of the logistics development is already in Haydock! This will mean that in St. Helens the economy will be even less diverse which is just the opposite of what it needs.

It is also worth noting that "The logistics industry across Europe is set to lose up to 40% of its low skilled workers due to the increasing cost effectiveness of robotic workers." "By 2020, robots are set to be considerably more cost effective than human labour." If the proposal is granted, within a few years we could be left with huge storage depots, lots of traffic congestion, no jobs and no green belt.

Releasing this Greenbelt for warehouse development will undoubtedly increase traffic congestion, increase air pollution, increase noise pollution and increase light pollution, and consequentially it will contribute to the irreparable damage of this habitat and its diverse flora and fauna, some of which are protected species.

The proposed site has substantial environmental interest and potential. The industrialisation of this locality will have an unacceptable adverse effect upon the environment and will change the nature and rural character of the area. Views of open countryside would be removed and there would be a detrimental impact on the openness of the Green Belt.

RO0492



St Helens
Council

13 MAR 2019

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at:
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Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: Mrs

First Name: Julie

Last Name: Duffy

Organisation/company: _____

Address: 440 Liverpool Rd
Penfold Haydock

Postcode: WA11 9RP

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 12.03.19

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(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

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3. To which part of the Local Plan does this representation relate?									
Policy	LPA05 SITE 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>Don't know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

<p>6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u></p> <p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p>
--

There is no justification for any more development on any Greenbelt land in Haydock. Haydock will never recover from the recent council decision to grant planning permission for 2 enormous warehouses, that are not even in standing with the adjacent ^{small scale} industrial buildings never mind the surrounding residential area. Haydock's infrastructure cannot cope with any further development. Roads are currently unable to cope with the amount of traffic and further development will inflict ^{further} misery on both residents and all road users. ^{Further development} will result in traffic gridlock.

Continued on attached sheet.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from Greenbelt.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Thank you for taking the time to complete and return this response form.

1800756M

Julie Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA05 Site: 2HA

Continued from part B box 6

Extra housing in this area isn't sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Doctor's surgeries and schools are full to capacity and roads are in constant gridlock, often putting unpaid extra hours on the working week.

The proposed access to the site is wholly inadequate; a left in/left out from the East Lancashire Road will threaten highway safety and the proposal for a junction at Liverpool Road & Vicarage Road would increase traffic volume to unprecedented levels on an already congested, over-stretched highways system.

This proposal does not include the 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated once the new development is in full operation. Using the developer's own figures that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. And this is highly likely to be an underestimate. Haydock's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

Another consequence of this development could be flooding. Has the drainage capacity been adequately assessed and has the Environment agency passed comment as their report would be key? What is the predicted impact on water flow rates and water quality? There are existing flooding problems at this site and any remedies to prevent this would place even greater amounts of water into Clipsley Brook. The proposed development will also surely have a detrimental impact upon the wildlife value of Clipsley Brook, streams, water voles and bluebell woodland etc. The brook would be underground and completely lost forever – the long term effects will be the complete destruction of a natural environment.

There is no statement of common ground with neighbouring authorities.

It is my understanding that the number of existing empty properties together with land that has also acquired planning permission for housing already exceeds the number of houses required for the council to meet their quota.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and the borough's employers pay 15 per cent below the national average for salaries. A point brazenly publicised by developers. It is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. There is no incentive for people to

move to the area and there doesn't appear to be the financial capability to obtain mortgages for new properties. Has the Council factored any of this information into their assessment?

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Due to the undeniably vast increase in the use of HGV's whilst building and private cars that is highly likely to be generated by this unnecessary residential development, road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And AIR pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

The proximity of cycle paths (cyclists, joggers and walkers are all at risk) should be incorporated into all independent air pollution investigations and all independent air pollution investigations should be conducted during peak times and not in school holidays.

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

Planning Failure - "Air pollution is the grossest manifestation of a failure of UK transport planning to take the environmental impacts of transport choices sufficiently into account."

"Air pollution-related morbidity and mortality are at epidemic levels - and, although less obvious, are more significant than road transport collisions as a cause of death and injury.

"There needs to be a strong political and societal commitment to protecting public health, particularly the health of children, whose life chances can be seriously compromised by exposure to air pollution."

"Currently, air pollution is a shared priority between Defra and the Department for Transport, but shared priority does not mean equal priority. Transport policy and planning has instead prioritised safety and economic growth."

That pollution is estimated to shorten the lives of more than 50,000 people a year.

This is far higher than the number of deaths caused by traffic accidents (1,713 in 2013) - yet road safety is a much higher priority for planners than pollution, the researchers say.

Dr Tim Chatterton and Professor Graham Parkhurst - 30 August 2016

The estimate for the UK is that 50,000 people die every year with conditions linked to polluted air and earlier this year the World Health Organisation warned that air pollution was leading to as many as three million premature deaths every year.

Air pollution was linked to a significant increase in the risk of Alzheimer's disease by a major study published in 2015, while other research showed brain damage related to Alzheimer's disease in children and young adults exposed to air pollution. Air pollution has also been linked to dementia in older men and women.

Air pollution is a global health crisis that kills more people than malaria and HIV/Aids combined and it has long been linked to lung and heart disease and strokes. But research is uncovering new impacts on health, including degenerative brain diseases such as Alzheimer's, mental illness and reduced intelligence.

Toxic nanoparticles from air pollution have been discovered in human brains in "abundant" quantities, a newly published study reveals.

"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." *Professor Barbara Maher 05/09/2016*

① - LPA04

② - Statement of Common Ground

PF0689

753

13 MAR 2019

Ref: LPSD

(For official use only)



St Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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(we will correspond via your agent)

Title: Mrs

First Name: Julie

Last Name: Duffy

Organisation/company: _____

Address: 440 Liverpool Rd

Penfold Haydock

St Helens

Postcode: WA11 9RP

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 12.03.19

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Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

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Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

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If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p><i>There is no justification for the development of Greenbelt land in Haydock. This council, officially the most complained about council in the St Helens regions, has a history of going against residents wishes. They should be made to provide proof of how it obtained its population estimates and the exact formula it used.</i></p> <p><i>Using Greenbelt for development without encouraging the use of brownfield sites sets an unwanted precedent.</i></p> <p><i>Continued on attached sheet.</i></p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)			
<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination

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<input checked="checked" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination

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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Please keep a copy for future reference.

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Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Julie Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA04 Site: 2EA, 5EA, 6EA

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are in constant gridlock, often putting unpaid extra hours on the working week.

Additional warehouse development will vastly increase traffic volume to unprecedented levels on an already congested, over-stretched highways system that still has to account for an additional (under) estimated 6700 vehicle movements a day, generated by the opening of the newly built inappropriate warehouse development adjacent to the proposed removal of Greenbelt for warehouse development.

The Council has already granted planning permission in the Greenbelt in respect of site 2EA – Florida Farm North. Residents have suffered enough.

There is no statement of common ground with neighbouring authorities.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and it is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. We have suffered enough. The region's limited infrastructure cannot cope with any further development and will only succeed in bringing the area to a halt.

This proposal does not include the 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated once the new development is in full operation. Using the developer's own figures that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. And this is highly likely to be an underestimate. Haydock's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such significant additional development is highly likely to generate.

The visual impact from Liverpool Road/Garswood Road will be severe. Current protected countryside views to be replaced by sizeable warehousing and will take many years for proposed landscaping works to shield. This will result in fields along Liverpool Road and A580 south being isolated and unviable, encouraging further development proposals to come forward on these sites in the future.

The development would be an additional incongruous feature on the landscape with a substantial disparity in scale with the surrounding houses.

The increased industrialisation of this neighbourhood will make Haydock a less attractive proposition to prospective home buyers, particularly in the areas suffering the greatest

impact. This will in due course lead to a significant demise in resident turn over and will ultimately affect the demographics of the area. The long term knock on effects could be catastrophic for Haydock in many ways.

Noise is an underestimated threat that can cause a number of short- and long-term health problems, such as for example sleep disturbance, hormonal & cardiovascular effects, hypertension, poorer work and school performance, hearing impairment, etc. Noise has emerged as a leading environmental nuisance in the WHO European Region, and the public complains about excessive noise more and more often. This development is highly likely to create noise over and above WHO guidelines. This is a problem that will be further exacerbated in the evening and early hours i.e. noise and disturbance from vehicles entering and leaving site 24 hours a day and noise from reversing warnings on vehicles throughout the night. Traffic noise on the A58 Liverpool Road is a big issue for me [REDACTED] I need to wear ear plugs to enhance my chances of undisturbed sleep from traffic noise during the early hours. And entering and exiting my access road (see paragraph below) is very difficult and extremely dangerous as it is.

It is also worth noting the substandard and dangerous access via Calday Grove/Liverpool Road junction. Visibility for drivers is approximately half of that recommended as a **minimum** in local and national planning guidance (St Helens MBC's "Highways for Adoption – A Planning Guide" and "Places, Streets and Movement" DETR). Residents also face significant time delays and restrictions of access when leaving the site at peak times.

St Helens is already the second noisiest part of the North West according to data gathered by noise monitoring researchers Cirrus.

There's a Council perception of an overriding need for logistics in Haydock to serve St Helens and the wider city region, but St Helens Metropolitan Borough Council Draft SA/SEA Scoping Report December 2015 provides us with the following statistical information: Employment and economic activity in the borough - 4.80 Transport storage (logistics) is a major strength for St Helens, representing the highest proportion of employees in the whole of the North West (8.7%) of the workforce - 5,200 employees), almost double the national average.

Most of the logistics development is already in Haydock! This will mean that in St. Helens the economy will be even less diverse which is just the opposite of what it needs.

It is also worth noting that "The logistics industry across Europe is set to lose up to 40% of its low skilled workers due to the increasing cost effectiveness of robotic workers." "By 2020, robots are set to be considerably more cost effective than human labour." If the proposal is granted, within a few years we could be left with huge storage depots, lots of traffic congestion, no jobs and no green belt.

Development of this Green Belt will undoubtedly increase traffic congestion, increase air pollution, increase noise pollution and increase light pollution, and consequentially it will contribute to the irreparable damage of this habitat and its diverse flora and fauna, some of which are protected species.

The proposed site has substantial environmental interest and potential. The industrialisation of this locality will have an unacceptable adverse effect upon the

environment and will change the nature and rural character of the area. Views of open countryside would be removed and there would be a detrimental impact on the openness of the Green Belt.

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Due to the undeniably vast increase in the use of HGV's whilst building and private cars that is highly likely to be generated by this unnecessary residential development, road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And AIR pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

The proximity of cycle paths (cyclists, joggers and walkers are all at risk) should be incorporated into all independent air pollution investigations and all independent air pollution investigations should be conducted during peak times and not in school holidays.

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

"Air pollution is the grossest manifestation of a failure of UK transport planning to take the environmental impacts of transport choices sufficiently into account."

"Air pollution-related morbidity and mortality are at epidemic levels - and, although less obvious, are more significant than road transport collisions as a cause of death and injury."

"There needs to be a strong political and societal commitment to protecting public health, particularly the health of children, whose life chances can be seriously compromised by exposure to air pollution."

"Currently, air pollution is a shared priority between Defra and the Department for Transport, but shared priority does not mean equal priority. Transport policy and planning has instead prioritised safety and economic growth."

That pollution is estimated to shorten the lives of more than 50,000 people a year.

This is far higher than the number of deaths caused by traffic accidents (1,713 in 2013) - yet road safety is a much higher priority for planners than pollution, the researchers say.

Dr Tim Chatterton and Professor Graham Parkhurst - 30 August 2016

The estimate for the UK is that 50,000 people die every year with conditions linked to polluted air and earlier this year the World Health Organisation warned that air pollution was leading to as many as three million premature deaths every year.

Air pollution was linked to a significant increase in the risk of Alzheimer's disease by a major study published in 2015, while other research showed brain damage related to Alzheimer's disease in children and young adults exposed to air pollution. Air pollution has also been linked to dementia in older men and women.

Air pollution is a global health crisis that kills more people than malaria and HIV/Aids combined and it has long been linked to lung and heart disease and strokes. But research is uncovering new impacts on health, including degenerative brain diseases such as Alzheimer's, mental illness and reduced intelligence.

Toxic nanoparticles from air pollution have been discovered in human brains in "abundant" quantities, a newly published study reveals.

"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." *Professor Barbara Maher 05/09/2016*

RO0493

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: Mr

First Name: Callum

Last Name: Duffy

Organisation/company: _____

Address: 440 Liverpool Road

Haydock, Penrith, St. Helens

Postcode: WA11 9RP

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 25/02/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA04 Sites 2EA 5EA 6EA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Don't Know
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>There is no plausible justification for continued development on Greenbelt. The council should be put to strict proof of its population estimates. The population of St. Helens has been in decline since 1981. Where are all the extra people coming from? How has the Council formulated its population estimates?</p> <p>Using Greenbelt for development sends out the wrong message. It fails to encourage the recycling of derelict and other urban land.</p> <p>The release of Greenbelt will cause significant harm to the purposes of the Greenbelt.</p> <p>Continued on attached sheet.</p>	

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

<p>8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)</p>			
<p>✓</p>	<p>No, I do not wish to participate at the oral examination</p>		<p>Yes, I wish to participate at the oral examination</p>

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Thank you for taking the time to complete and return this response form.
Please keep a copy for future reference.**

Callum Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA04 Site: 2EA, 5EA, 6EA

Continued from part B box 6

Increased development in this area is not sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Roads are frequently gridlocked, often putting extra unpaid hours on the working week.

The proposal to remove this land from the Greenbelt for additional warehouse development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed sizeable inappropriate warehouse development on Florida Farm North (adjacent to this land), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock's and the surrounding area's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

The Council has already granted acutely contentious planning permission in the Greenbelt in respect of site 2EA – Florida Farm North. Residents have suffered enough.

There is no statement of common ground with neighbouring authorities.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and it is also widely accepted that Haydock has reached gridlock, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. We have suffered enough. The region's limited infrastructure cannot cope with any further development and will only succeed in bringing the area to a halt.

The visual impact from Liverpool Road/Garswood Road will be severe if this Greenbelt is removed to accommodate yet more warehousing would be an unnecessary additional incongruous feature on the landscape with a substantial disparity in scale with the surrounding houses. This will result in fields along Liverpool Road and A580 south being isolated and unviable, encouraging further development proposals to come forward on these sites in future years.

The increased industrialisation of this neighbourhood will make Haydock a less attractive proposition to prospective home buyers, particularly in the areas suffering the greatest impact. This will in due course lead to a significant demise in resident turn over and will ultimately affect the demographics of the area. The long term knock on effects could be catastrophic for Haydock in many ways.

Noise is an underestimated threat that can cause a number of short- and long-term health problems, such as for example sleep disturbance, hormonal & cardiovascular effects, hypertension, poorer work and school performance, hearing impairment, etc. Noise has emerged as a leading environmental nuisance in the WHO European Region, and the public complains about excessive noise more and more often. Release of this Greenbelt for further unnecessary warehouse development is highly likely to create noise over and above WHO guidelines. This is a problem that will be further exacerbated in the evening and early hours i.e. noise and disturbance from vehicles entering and leaving site 24 hours a day and noise from reversing warnings on vehicles throughout the night. Traffic noise on the A58 Liverpool Road is already a big issue [REDACTED] near to the junction with the East Lancashire Road.

It is also worth noting the substandard and dangerous access via Calday Grove/Liverpool Road junction. Visibility for drivers is approximately half of that recommended as a **minimum** in local and national planning guidance (St Helens MBC's "Highways for Adoption – A Planning Guide" and "Places, Streets and Movement" DETR). Residents also face significant time delays and restrictions of access when leaving the site at peak times.

St Helens is already the second noisiest part of the North West according to data gathered by noise monitoring researchers Cirrus.

There's appears to be a Council perception of an overriding need for logistics in Haydock to serve St Helens and the wider city region, but St Helens Metropolitan Borough Council Draft SA/SEA Scoping Report December 2015 provides us with the following statistical information: Employment and economic activity in the borough - 4.80 Transport storage (logistics) is a major strength for St Helens, representing the highest proportion of employees in the whole of the North West (8.7%) of the workforce - 5,200 employees), almost double the national average.

Most of the logistics development is already in Haydock! This will mean that in St. Helens the economy will be even less diverse which is just the opposite of what it needs.

It is also worth noting that "The logistics industry across Europe is set to lose up to 40% of its low skilled workers due to the increasing cost effectiveness of robotic workers." "By 2020, robots are set to be considerably more cost effective than human labour." If the proposal is granted, within a few years we could be left with huge storage depots, lots of traffic congestion, no jobs and no green belt.

Releasing this Greenbelt for warehouse development will undoubtedly increase traffic congestion, increase air pollution, increase noise pollution and increase light pollution, and consequentially it will contribute to the irreparable damage of this habitat and its diverse flora and fauna, some of which are protected species.

The proposed site has substantial environmental interest and potential. The industrialisation of this locality will have an unacceptable adverse effect upon the environment and will change the nature and rural character of the area. Views of open countryside would be removed and there would be a detrimental impact on the openness of the Green Belt.

①

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Should this Greenbelt be released for warehouse development there will be a substantial increase in the use of HGV's and other road vehicles. Road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And AIR pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

"If there's at least a possibility that exposure to traffic pollution is having even worse health impacts than were previously known, then take the steps you can to reduce your dose as far as you can." Professor Barbara Maher 05/09/2016

①-LPA05

②-Statement of Common Ground

PF0691

755

13 MAR 2019

Ref: LPSD

(For official use only)

St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

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This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: Mr

First Name: Callum

Last Name: Duffy

Organisation/company: _____

Address: 440 Liverpool Road
Haydock, Prescot, St. Helens

Postcode: W11 9RP

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature: _____

Date: 25/02/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

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Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:
post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA05 Site 2HA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Not Sure
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Using Greenbelt for development fails to encourage recycling of derelict and other urban land including brownfield sites

There is no justification. The Council should be put to strict proof of its population estimates. The population of St. Helens has been in steep decline since 1981. Where are all the extra people coming from? What is the unique selling point of a borough in gridlock and a borough that pays a salary 15% below the national average? How have St. Helens Council formulated its population estimates.

The release of Greenbelt will cause significant harm to the purposes of the Greenbelt. Continued on attached sheet

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

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8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

Callum Duffy

440 Liverpool Road, Haydock, St Helens, WA11 9RP

Policy: LPA05 Site: 2HA

Continued from part B box 6

Extra housing in this area isn't sustainable on the grounds of increased traffic, pollution and unmanageable pressures on the local and surrounding infrastructure. Doctor's surgeries and schools are full to capacity and roads are frequently gridlocked, often putting extra unpaid hours on the working week.

Should this land be released from the Greenbelt, the proposed access to the site is wholly inadequate; a left in/left out from the East Lancashire Road will threaten highway safety and the proposal for a junction at Liverpool Road & Vicarage Road would increase traffic volume to unmanageable levels on an already congested, over-stretched highways system.

The proposal to remove this land from the Greenbelt for development has not factored in the estimated 6,715 additional vehicle trips per day, including 1,366 HGV trips per day that will be generated by the newly constructed contentious warehouse development on Florida Farm North (opposite the greenbelt site set aside for 522 houses), once it is fully operation. Using the Florida Farm North developer's own figures, that is over a 20% increase in traffic flow on the A580 and around an 8% increase on the A58. Haydock's limited infrastructure cannot possibly be upgraded to accommodate the level of increased traffic flow such a significant additional development is highly likely to generate.

Another consequence of releasing this greenbelt for development could be flooding. Has the drainage capacity been adequately assessed and has the Environment agency passed comment as their report would be key? What is the predicted impact on water flow rates and water quality? There are existing flooding problems at this site and any remedies to prevent this would place even greater amounts of water into Clipsley Brook. The proposed development will also surely have a detrimental impact upon the wildlife value of Clipsley Brook, streams, water voles and bluebell woodland etc. The brook would be underground and completely lost forever – the long term effects will be the complete destruction of a natural environment.

There is no statement of common ground with neighbouring authorities.

It is my understanding that the number of existing empty properties together with land that has also acquired planning permission for housing already exceeds the number of houses required for the council to meet their quota. There is no need to release this land from the Greenbelt.

Haydock is fast becoming a low paid logistics haven (penalised for its proximity to the motorway network) and the borough's employers pay 15 per cent below the national average for salaries. A point brazenly publicised by previous developers. It is also widely accepted that Haydock and the roads into the area are often gridlocked, particularly the East Lancs Road where locals, commuters and visitors are suffering on a daily basis. There is no incentive for people to move to the area and there doesn't appear to be the financial capability to obtain mortgages for new properties. Has the Council factored any of this information into their assessment?

Road transport accounts for a significant portion of air pollution in cities and towns, causing serious pollution problems like carbon monoxide and smog. Due to the undeniable increase in the use of HGV's whilst building the houses and private car useage that is highly likely to be generated by this unnecessary residential development, road traffic pollution has to be considered a major threat to air in the local vicinity and beyond. Traffic fumes contain harmful chemicals that pollute the atmosphere and will unquestionably, particularly long term, be detrimental to health. Road traffic emissions also produce greenhouse gases that contribute to global warming, a trend that we as a society in general need to buck.

It is also worth noting that in 2013, St Helens was in the top 40 local authorities of 150 in the country for premature death rates for U75s. And **AIR** pollution in St Helens is responsible for almost 100 deaths per year according to a report published in January 2016. Public Health England (PHE) estimates that "outdoor air pollution is responsible for the equivalent of 98 deaths in St Helens per year", and the report adds: "This is equal to about a third of all deaths from respiratory illness and 5.5 per cent of all deaths in St Helens per year." It goes on to say that people in disadvantaged areas are more likely to be exposed to air pollution, so the issue contributes to the town's health inequalities. It says vehicle emissions, particularly from diesel cars, cause up to 90 per cent of the harmful pollution and adds that four areas of town are subject to regular air quality monitoring. It adds: "Although air quality has improved over the decades there have been no improvements since 2008." (Source: National League Table).

The proximity of cycle paths (cyclists, joggers and walkers are all at risk) should be incorporated into all independent air pollution investigations and all independent air pollution investigations should be conducted during peak times and not in school holidays.

If air pollution is not given serious consideration, we will see an increase in respiratory conditions that will affect the borough's mortality rates for future generations.

RO0494



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: <i>PETER DUFFY</i>	First name:
Last Name:	Last Name:
Organisation/company:	Organisation/company:
Address: <i>122 Gartons Lane</i>	Address:
Postcode: <i>WA9 4BZ</i>	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

Date:

28.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO0495



St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

13 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details

(we will correspond via your agent)

Title: Mr.

First Name: Philip

Last Name: DUMBELL

Organisation/company: _____

Address: 18 CALDER DRIVE
RAINHILL

Postcode: L35 0NW

2. Your Agent's Details (if applicable)

Title: _____

First name: _____

Last Name: _____

Organisation/company: _____

Address: _____

Postcode: _____

Tel No: _____

Mobile No: _____

Email: _____

Signature _____

Date: 12th March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

Please note we are unable to accept faxed copies of this form.

FURTHER INFORMATION

If you require further information please see the FAQs on our website: www.sthelens.gov.uk/localplan

If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: www.sthelens.gov.uk/localplan

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>I have identified all the above points as the development of housing on the Ecclestone Golf course will not be sustainable within the current infrastructure of the area due to lack of police highway access doctors & social services. Apart from loss of greenbelt, wildlife and a merging of district boundaries.</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

None! as the area is already overpowered by new housing estates which increased the area population, then with no additional services to support the increase in population.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)



No, I do not wish to participate
at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0496



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

27 FEB 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: www.sthelens.gov.uk/localplan

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

Part A - Personal Details

Part B - Your Representation(s)

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>MARGARET</u>	First name: _____
Last Name: <u>DUNN</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>42 CALDERHURST DRIVE</u> <u>WINDLE ST. HELENS</u>	Address: _____
Postcode: <u>WA10 6ED</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED]	Date: <u>21st Feb 2019</u>
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

☒ Yes (via email)

☐ No

Please note - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan
St.Helens Council
Town Hall
Victoria Square
St Helens
WA10 1HP**

or by hand delivery to:

Ground Floor Reception
St.Helens Town Hall
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

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If you still need assistance, you can contact us via:

Email: planningpolicy@sthelens.gov.uk

Telephone: **01744 676190**

NEXT STEPS

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DATA PROTECTION

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Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,
setting out your representation/comment.**

**Please use a separate copy of Part B
for each separate comment/representation.**

PART B - YOUR REPRESENTATION

- Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support the legal compliance or soundness of the Local Plan</u>, please also use this box to set out your comments.</p> <p>The analysis is based on assumption not fact. I believe more reasonable options have not been fully explored i.e. the development of brownfield land closer to the town centre. This would then mean it unnecessary to put in place the additional infrastructure, which would be vital if the proposed plan was to go ahead.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.

Please keep a copy for future reference.

RO0497



St. Helens
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**.
Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1192
13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: ANTHONY	First name:
Last Name: DUNN	Last Name:
Organisation/company:	Organisation/company:
Address: 8 DALE CRESCENT ST HELENS	Address:
Postcode: WA9 4XF	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED]	Date: 29/4/19
-----------------------	---------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☒

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO0498

Representor Details

Web Reference Number	WF0314
Type of Submission	Web submission
Full Name	Mr Christopher Dunn
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05/LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

① I strongly believe adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and therefore, no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The statement from St Helens Council of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens.

② Two Green Belt sites of 49 ha and 53 ha are being reclassified as 'safeguarded' land sites and included to fulfill the housing need, much less than 7% of the 3,170-ha available, if it were to be re-mediated.

There is no reason or sense to release green belt land when so much brownfield land is available within the borough - land that should and can be re-mediated.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into

use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.

② The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

↳ ①

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/7/2019 11:02:31 AM
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RO0499

Representor Details

Web Reference Number	WF0315
Type of Submission	Web submission
Full Name	Mrs Susan Dunn
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05/LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I strongly believe adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and therefore, no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The statement from St Helens Council of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens.

Two Green Belt sites of 49 ha and 53 ha are being reclassified as 'safeguarded' land sites and included to fulfill the housing need, much less than 7% of the 3,170-ha available, if it were to be re-mediated.

There is no reason or sense to release green belt land when so much brownfield land is available within the borough - land that should and can be re-mediated.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into

use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.

② The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective. ①

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/7/2019 10:59:49 AM
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Representor Details

Web Reference Number	WF0316
Type of Submission	Web submission
Full Name	Mrs Susan Dunn
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05/LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I strongly believe adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and therefore, no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The statement from St Helens Council of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens.

Two Green Belt sites of 49 ha and 53 ha are being reclassified as 'safeguarded' land sites and included to fulfill the housing need, much less than 7% of the 3,170-ha available, if it were to be re-mediated.

There is no reason or sense to release green belt land when so much brownfield land is available within the borough - land that should and can be re-mediated.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into

use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.

② The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective. → ①

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/7/2019 10:59:44 AM
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Representor Details

Web Reference Number	WF0317
Type of Submission	Web submission
Full Name	Mrs Susan Dunn
Organisation	
Address	
Agent Details	

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via e-mail)

3. To which part of the Local Plan does this representation relate?

Policy	LPA05/LPA06
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Green Belt Review (2018)

4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I strongly believe adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and therefore, no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The statement from St Helens Council of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens.

Two Green Belt sites of 49 ha and 53 ha are being reclassified as 'safeguarded' land sites and included to fulfill the housing need, much less than 7% of the 3,170-ha available, if it were to be re-mediated.

There is no reason or sense to release green belt land when so much brownfield land is available within the borough - land that should and can be re-mediated.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into

use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered.

② { The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective. → ①

7. Please set out modification(s) you consider are necessary

Retain all Green belt areas for the future of our communities.

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8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/7/2019 10:58:22 AM
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RO0500



St. Helens
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs.	Title:
First Name: Hannah.	First name:
Last Name: Dunning	Last Name:
Organisation/company: Rutland House	Organisation/company:
Address: Abbotsheld Rd St Helens.	Address:
Postcode: WA9 4HU	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 28/3/19.
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Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes ☐ (Via Email)

No ☐

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.